DRL-2001-006105

Division of Radiation Contro

COMMENTS ON GROUNDWATER DISCHARGE PERMIT

By Charles Judd - October 26, 2009

Thank you for opportunity to comment on the proposed amendment to EnergySolutions Groundwater Elzivol Discharge Permit (UGW450005). It seems that the permit review has been done in a professional and thorough manner. After our review it has become clear that there are a few other items that should be considered and a couple of small changes that should be made to the permit. These items are listed below:

- 1) Water Balance Infiltration Models On page 3 of the Statement of Basis it says "Water balance infiltration models, constructed to evaluate seepage through the disposal cell, for both open and closed embankments, using average climatic conditions over a 12-year period demonstrated that seepage flux rates from an open embankment are comparable to the seepage flux rates from a closed or covered disposal cell." This statement needs to be further discussed. One of the main purposes for the cover material is to prevent infiltration into the embankment. If the cover does not decrease the amount of infiltration into the embankment then the cover design should be redesigned. The way the cell is constructed should also be included in this analysis. When the final cover is on the embankment then water will drain away from the cell. During the construction of the Class A cell the center of the embankment was the low point for much of the construction. This means the water drained to the center of the cell for years. This means that millions of gallons of water was introduced into the cell over the past few years. It is also clear that the longer that the cell is left open the more water that is introduced into the embankment. Even if it does take a long period of time to reach the groundwater wells the open cell time should be limited to limit the amount of water that is introduced into the cell.
- 2) Open Cell Requirements It has become very likely that EnergySolutions will not be able to meet the open cell requirements on the Class A cell. It will be near impossible that the 12 year limit can be met in this area and a violation will occur. Please refer to Attachment J for details of the open cell concerns. This amendment should address the affects of having the cell open for longer than 12 years. Please see attachment A.
- 3) 50 years of Unknown Contamination Page 3 states "potential contaminants in the groundwater would not reach a near by compliance monitoring well for roughly 50 years or more under this scenario." This is a positive as far as relaxing the sampling frequency but it is not helpful to understand failure of the constructed cells. The completed LARW cell cover is not performing to the expected level. It may be necessary to construct several monitoring wells closer to the embankment so that improper leaking can be detected earlier. It seems that the major areas of concern with the LARW cell are in the northeast corner and the southwest corner of the cell. Because of the mounding under the 11e.(2) cell it may be best to put additional wells along the east side of the LARW to better check for premature leaking of the cell. Please see Attachment B.
- 4) Changes in 11e.(2) cell requirements ES is suggesting that they should change the constituents that they should be monitoring in the 11e.(2) cell area (pages 6 -9 of the

Statement of Basis). This may be a sound approach if the area was to be used for 11e.(2) waste disposal in the future. At the present time it is understood that ES may be asking to change a portion of the 11e.(2) cell to accept LLW. If this change is looming in the near future then changes should not be made at this time. Until a final decision is made on the kind of waste that is to be disposed in this area then changes should not be made. It also seems that he southwest portion of the site is not very stable when it comes to groundwater issues. There are still several unknowns about the groundwater in this area. Before changes are made in the classification of waste placed in this area, the groundwater issues need to be resolved. Issues that need to first be resolved include such things as the vertical gradient of the groundwater, the horizontal hydraulic gradient of the groundwater, the mounding issue, the source of surface water entering the ground, the possibility of an underground stream in the area, etc. Please see Attachment C.

- 5) On page 19 of the Statement of Basis it discusses the as-built reports and requires that ES to include a report of the capacity issues of their site. Included in this is the requirement to report the remaining disposal capacity. This is an important requirement. To determine the correct remaining capacity it is important that ES include the amount of cell space that will be required to be used by a) site cleanup, b) temporary cover, c) interim cover, d) cover over the clay liner and e) clean fill around CWF and other debris. At the present time the remaining cell space is approximately 1.9 million cubic yards. Of that amount 320,000 cubic yards is reserved for site cleanup, 200,000 will be used for temporary cover and interim cover, 50,000 will be used for cover over the clay liner, and about 230,000 cubic yards for clean fill around CWF and other debris. This means that the remaining capacity is just over 1 million cubic yards (or 29 million cubic feet). Including all numbers in remaining capacity is an important consideration for the State of Utah.
- 6) It is unclear whether updated data was used to evaluate the performance of the cells at Clive. For example the average temperature data can greatly affect the frost penetration analysis. Attachment D is a presentation on how data should be updated to better analyze the site.

Attachment A - Open Cell Requirements

One of the main concerns is that the disposed waste is not exposed to the environment for long periods of time. The waste embankment is supposed to be covered with a temporary cover as soon as it reaches the top of waste limits. It seems that Energy Solutions is not completing this function as it should. This allows the wind and water to have more access to the waste and would create a situation where there is more potential for contamination.

There are other rules to limit the spread of contamination. To limit the amount of water that passes through the embankment while the cell is open to the environment there is a set rule that states that the cell can only be open for 12 years before the final cover is completed. The State of Utah seems to have program where they monitor the amount of time that a cell is open. Attachment 13-1 is an example of the "Class A Open Cell Time Limitation Report." This report is a good summary of the different times in which cell areas were opened. From this report it is easy to see when a certain area needs to be closed with a final cover. Attachment 13-2 shows a map giving the locations of some of the lift areas of the Class A cells.

One of the problems is that you cannot close a small portion of the cell and have it function properly. For example it seems that the first area where waste was placed in the Class A cell was in an area referred to as H12, H17 and H20 (Attachment 13-3). Waste was first placed there in 2000. Therefore the final cover needs to be completed over these areas in 2012. The problem is that you cannot just put a cover over these areas. Attachment 13-4 shows a rough sketch of what the cell would look like if you placed a cover just over this area. The water flow off of the embankment would be adjusted. Water would penetrate into the embankment and down through the waste so that the 12 year limit was violated. The only way to make the 12 year open cell limit work is to cover larger areas of the embankment.

Attachment 13-5 shows a plan where the different areas would be covered in larger sections so that the flow of water could be contained properly. This also would be much better for differential settlement between transition areas. This type of plan is the only type of plan that would work. This type of plan needs to be implemented immediately.

The reason that this is such a concern is that under the current plan the cells cannot be closed properly before the 12 year time expires. A look at Attachment 13-4 shows that at the end of 2006 the area over H12 has not been filled with waste. It is doubtful that is filled with waste even today. If you filled the area over H12 by the end of 2008 you could place the temporary cover over this material at that time. This waste column would have been placed quickly and would be next to an area where waste had been placed for about 5 years. This would mean that initial settlement would go on for at least 5 years. This is expected because of the data collected from the LARW cell. In five years the initial differential settlement may be done and then it will take about one year to construct the final cover. This means

that the cover cannot be completed properly until 2014. This would be a violation of the open cell limit of 12 years.

Therefore, even if work began to close this section right now there has to be a new plan to get the cell closed in 12 years. If may be necessary to surcharge the area. However, there is no data to know how much this will help in settlement efforts. It may be necessary to install some temporary synthetic liner to keep moisture out of the cell. The problem is that time has already run out and there is no proven way to close the facility properly.

A plan needs to be incorporated where the open cell requirement is tracked properly and issues are resolved in advance, not after there is a problem.

ATTACHMENT B

Class A and Class A North Cell Reports & Cell Maps Envirocare of L.ah, LLC.
Class A Open Cell Time Limitation
Cell Report
12/31/2005

	Date	Current Activity	NW Coordinates	rdinates	Area	Тетр.		Radon Ba	Radon Barrier Slope Coverage	Coverage		Final	Side-stope
	Opened		North	East	(8q.ft.)	Date	Top	North	East	South	West	Date	Cate
	10/18/00	Waste Placement	12,895	11,480	70,214								
	11/08/00	Top of Waste	12,880	11,945	47,716	Partial							
	11/08/00	Top of Waste	East 1/2 of H17	of H17	V/N	01/02/03							
•	12/08/00	Top of Waste	12,880	12,262	53,175	01/02/03							
	01/15/01	Waste Placement	12,721	11,460	64,372	Partial							
_	01/04/01	Top of Waste	12,729	12,270	56,264	11/15/01							
	01/04/01	Top of Waste	East 1/2 of E20	of E20	N/A	11/15/01						•	
	01/05/01	Top of Waste	12,730	11,966	51,214	Partial							
	04/19/01	Waste Placement	12,880	11,863	12,292								
	08/06/01	Waste Placement	12,562	11,460	67,248	Partial							
	04/25/01	Waste Plecement	East 1/2	1/2 of C12	V/N								
	04/25/01	Top of Waste	12,561	12,062	60,339	10/02/02							
	04/25/01	Top of Waste	East 1/2 of C18	of C18	A/N	10/02/02							
9	05/21/01	Waste Placement	12,730	11,863	17,276								
	08/01/01	Waste Placement	12,920	11,150	35,020								
	08/27/01	Top of Waste	12,712	11,151	48,399	Partial							
	09/17/01	Top of Waste	12,653	10,866	64,410	Partial							
	10/04/01	Top of Waste	12,450	11,460	42,581	Partial							
	10/23/01	Top of Waste	12,450	11,654	11,747	Partial							
816 12	12/07/01	Top of Waste	12,450	11,864	45,101	Partial							
	12/20/01	Top of Waste	12,450	11,707	35,193	Partial							(
	01/31/02	Top of Waste	12,450	12,062	61,765	10/02/02							
SW)	10/22/01	Waste Placement	13,187	11,456	10,000								
	09/11/02	Waste Placement	12,920	10,978	45,969								
	11/25/02	Waste Placement	12,920	10,847	34,929								
	03/26/02	Top of Waste	12,336	12,062	65,485	10/02/02							
	03/26/02	Top of Waste	East 1/2 of A18	of A18	ΑŻ	10/02/02							
(SE)	10/28/02	Waste Placement	13,187	11,556	20,000								
rs —	08/06/01	Waste Placement	Split from C12	m C12	ΥŽ								
	07/02/02	Top of Waste	12,427	10,866	52,719	09/25/03							
<u> </u>	07/25/02	Top of Waste	12,491	11,151	55,721	03/52/03				 - 			
	10/14/02	Top of Waste	12,653	10,644	90,004	Partial							
	08/06/01	Waste Placement	Split from	from	Ϋ́Z	Partial							
/E/	10/14/02	Top of Waste	South 1/2 of E4	2 of E4	₹ Ž	01/11/05							
E1 01/	01/13/03	Top of Waste	12,664	10,348	57,066	01/11/05							

Page 1 of 4

Envirocare of Jiah, LLC.
Class A Open Cell Time Limitation
Cell Report

<u>0</u>	Date	All shops to the state of	NW Coordinates	rdinates	Area	Temp.		Radon Ba	Radon Barrler Slope Coverage	Coverage		Final	Side-slope Final Cover
	Opened		North	East	(sq.ft.)	Dage E	Top	North	East	South	West	Date	Dete
<u> </u>	01/14/03 05/02/03	Top of Waste Top of Waste	12,467 12,821	10,345 10,351	64,725 67,682	01/17/05 Partial							
H1	07/22/03	Top of Waste	12,891	10,366	33,053	Partial							
Lo(norin) H11	04/28/03	Waste Placement Waste Placement	13,320	10.904	10,000	ת בידי							(
L12 (remaining)	09/24/03	Waste Diagonat	12.260	11 156	SE 745								5
115	10/15/03	Waste Placement	13,283	11,765	71,098	•							
7. 19.	0000	i		1									
(remaining)	10/02/03	Waste Placement	13,320	10,904	26,529								
L3	03/11/04	Waste Placement	13,282 11,99 Southeast section	11,99/	10,000			,					
K19	03/25/04	Waste Placement	Split from J18 (east 1/2)	8 (east 1/2)	A/N						i		
319	05/28/04	Waste Placement	13,288	12,192	51,770	Partial							
721	06/14/04	Top of Waste	13,255	12,354	31,876	10/26/05							
13		i											
N20	7/26/04	Waste Placement	13,140	10,618	20,002	leitre C							
	1000	י טף טו אימפוני	13,360	017,21	20,120	מונוסו							
15 (16 west)	7/19/04	Waste Placement	12,919	10,786	20,348								
N17	8/17/04	Waste Placement	13,588	11,923	90.047	11/15/05							
(CLSM												-	•
area) L3 (N	8/23/04	Waste Placement	13,362	10,834	20,000								
Ext.)	10/29/04	Waste Placement	13,333	10,684	17,234								
103	11/12/04	Waste Placement	Split from 15 & 16	n 15 & 16	Ϋ́Z								
M17	12/1/04	Waste Placement	Split fro	Split from N17	N/A	Partial						_	
(Railcars)	12/18/04	Waste Placement	12 002	11 636	18 696								
117	1/26/05	Waste Placement	12.992	11,828	46,247	Partial							
L3 West	2/28/05	Waste Placement	13,376	10,520	62,583								···-
(north)	3/5/04	Waste Placement	13,619	11,923	17.150	10/26/05							
N15	3/7/05	Waste Placement	13,616	11,753	58,518	Partial							
N14	4/11/05	Waste Placement	13,628	11,642	29,491	Partial							

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. O. II T. TOACKINICA O. AGADA Embankment Cell Tracking 2005.xls

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Class A Open Cell Time Limitation Envirocare of Jtah, LLC. Cell Report 12/31/2005

Ce	Date	The state of the s	NW Coordinat	ordinates	Area	Temp		Radon Ba	Radon Barrier Slope Coverage	Coverage		Final	Side-slope
	Opened		North	East	(sd.ft.)	Cover	Тор	North	East	South	West	Date	
NWG8 Remainder	12/16/05	CWF Area	14,409	11,140	53.458								
				Total Area	3,031,536 ff ²								
KEY: -Lift Area = Unique alpha-nun-Begininning Date = Date of ir 'Lift ID in Beginning Date Colu FOR CURRENT ACTIVITY C	Unique alp g Date = Di sginning Da RENT ACT	KEY: -Lift Area = Unique alpha-numeric identification for each waste -Begininning Date = Date of initial placement of the first waste -Lift ID in Beginning Date Column Indicates Lift Merger FOR CURRENT ACTIVITY COLUMN -Waste Placement = Lifts for which top of waste has not been	ntion for each of the first of Lift Merger raste has not	waste placem waste lift or th been achieve	placement lift are lift or that lift area achieved or approved	ved							

- -Top of Waste = Lifts for which top of waste has been achieved or approved
- -Closure Construction = Lifts on which all clay radon barrier has been placed.
- -Closed & Covered = Lifts on which Cover Construction has been completed according
- - to design specifications.
- -Closure Date = Approval date for the completion of the radon barrier
- -Cover Date = Acceptance date for construction of final design rock cover.
 - (The year only is indicated for all cover completed prior to 2000)
 - N/A = Not applicable
- N/C = Not Constructed

Note:

-Lift areas listed are represented in attached drawing.

Envirocare or Jah, LLC.
Class A Open Cell Time Limitation
Cell Report
12/31/2005

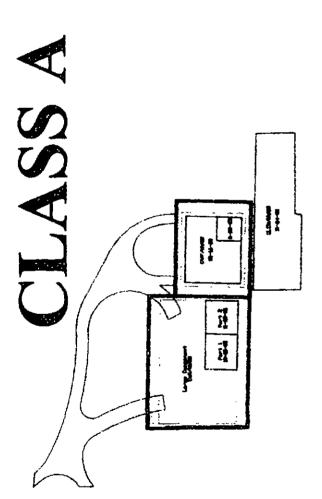
[] []	Date		NW Coordinates	dinates	Area	Temp.		Radon Ba	Radon Barrier Slope Coverage	Coverage		Final	Side-slope
3	Opened	בעוופוון אכוואווא	North	East	(sq.ft.)	Oate	Top	North	East	South	West	Date	Date
N12	4/12/05	Waste Placement	13,632	11,446	53,127	Partial							
Z	4/14/05	Waste Placement	13,634	11,385	43,068	10/06/05							
111	4/15/05	Waste Placement	12,710	11,370	31,004	12/02/05							
L2	4/15/05	Waste Placement	13,293	10,442	24,066								
-11	4/20/05	Waste Placement	12,989	11,385	35,287	_							
F6	6/17/05	Waste Placement	Split from 15 & 16	15.8.16	A/X								
110	7/27/05	Waste Placement	12,921	11,318	23,282	· · · ·							•
N11 (West													
Side													
Slope)	7/28/05	Waste Placement	13,635	11,342	30,676	Partial							
	1				,	Temp							
AWL01	8/1/05	Waste Placement	13,293	10,358	26,600	11/8/05					****		
AWG11	8/8/05	Waste Placement	Split from 110 & F11	10 & F11	۷/۷	Partial							
AWN01	8/10/05	Waste Placement	13,582	10,373	46,170	12/01/05							
AWN04	8/10/05	Waste Placement	13,582	10,616	45,790	12/01/05							
AWN06	8/10/05	Waste Placement	13,582	10,857	46,170	Partial							
CWF			 - 										
NWG8													
partial												•	
(Class A		Waste Placement											
North)	8/22/05	(CWF)	14,278	11,317	10,000								
AWL07	9/18/05	Waste Placement	13,397	10,910	12,903								•
NWG3												_	
Farial		i											
(CLASS A	40/40/06	Waste Placement	000	101	10 600								
AW.IOB	11/14/05	(Large Component)	13 130	10.774	24 949								
AWNOR	11/15/05	Waste Discoment	12,130	11 100	162 797								
AWL06	11/18/05	Waste Placement	13.392	10,879	8.360						:		
AWH07	11/18/05	Waste Placement	12,980	10,927	10,073								
001001	60	i	<u>.</u>	00111111	-	Temp							
BONAN	CD/97/11	waste Placement	Split from AWNUS	AWNOB	₹ Ž	12/2/03							
AWN10	12/7/05	Waste Placement	Split from N11 (west	411 (west)	∀ Ž								
(east)	12/12/05	CLSM Area	East of L3	of L3	10,259								
								-	F 17 0 1	OCC	oly, a	Dage	3 0 6 1
	1.11.11.1	・ ・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・	ant Oall Tranking /ENIC		ואריסה ואי	O STANDER THAT KINGSTANDER FINDBOKTHERIT CEIL TROKKING ZUUGSKOON	- そうしい マンドライ	• ⊢ mnankri	rent cen	PACKIFICA KON	O.Ma		t 5

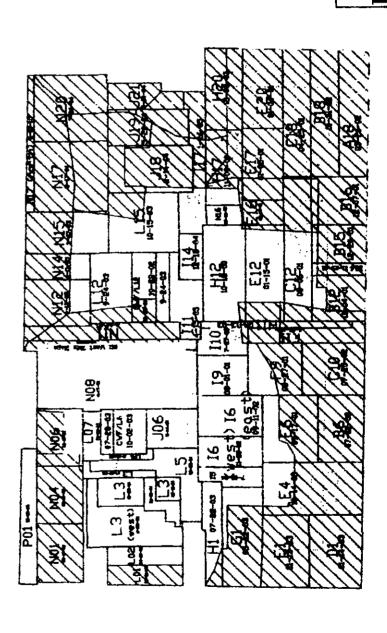


Attachment 13-2







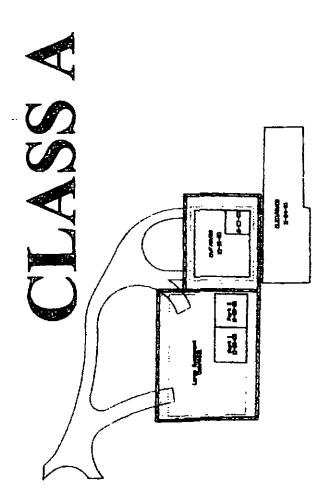


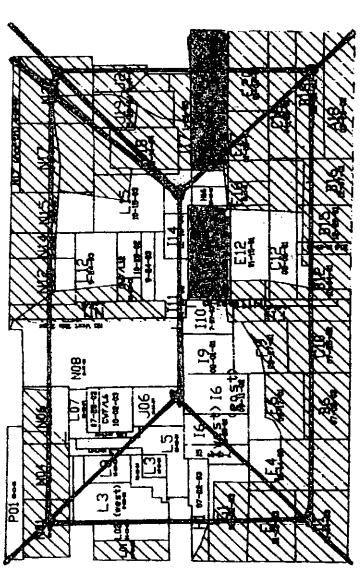


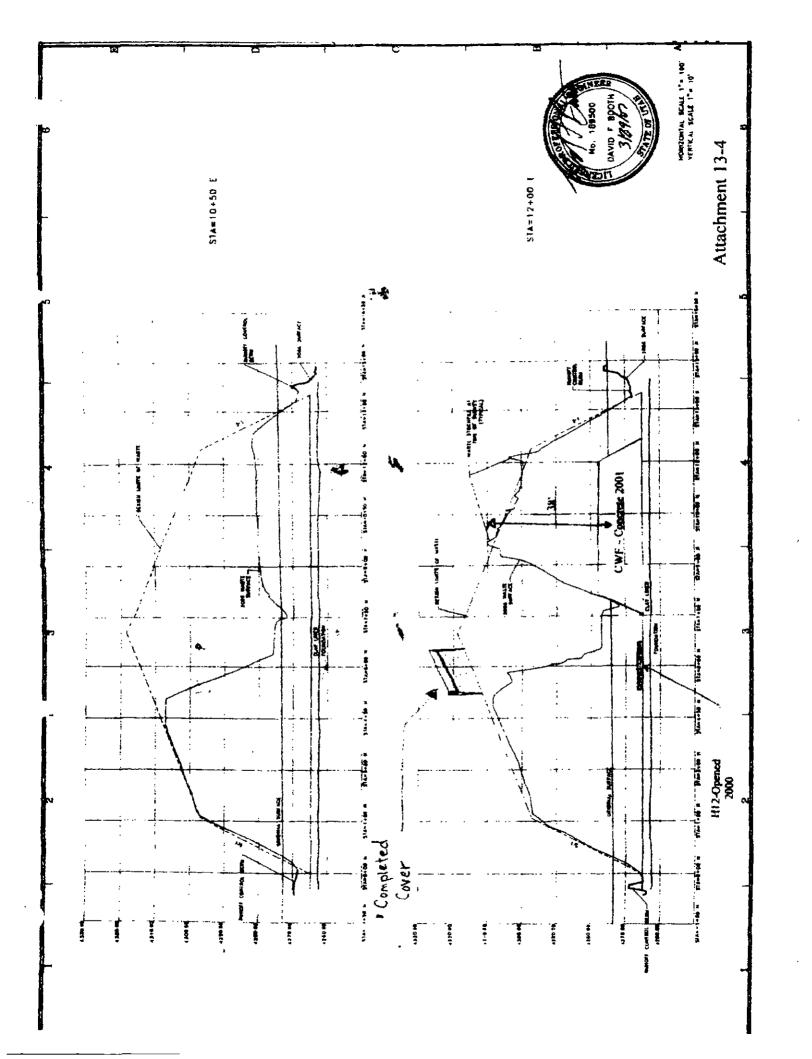
Attachment 13-3











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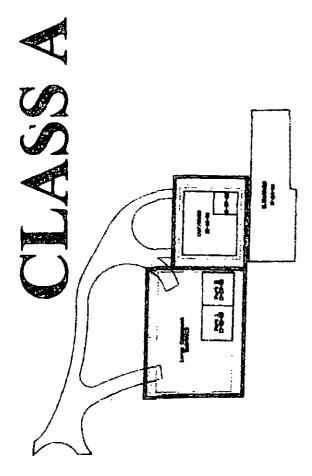
Attachment 13-5

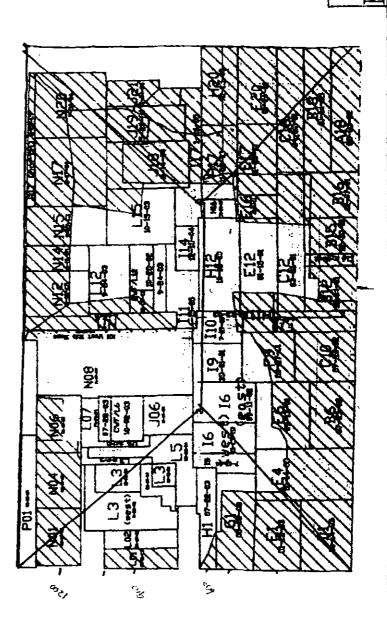
Cover Area 1 - (2012)

Cover Area 2 - (2012)

Temporary Cover 1,742,920 sf







Attachment B - Cover Failure

Attachment 7-1 is a map of the completed LARW cell at Clive. The map shows the contour lines as of the end of 2006. There are at least three areas of concern that can be seen just by looking at the contours. The problem areas are shown as Area A, B, and C. Attachment 7-2 shows a cross section of the cover system as it would have been constructed with the old design. The design allows for easy flow of water off of the embankment. Attachment 7-3 shows a cross section of Area C as it was at the end of 2006. In this area there is a section of the embankment that has shown slope reversal. The portion near the edge of the embankment is actually higher than a section of the embankment closer to the middle of the cell. The cross section shows the expected affect of this settlement on the layers of the cover below the rock erosion barrier. As the cover is now constructed the water that is collected in the filter zone begins to run toward the edge of the embankment. Instead of flowing off of the side of the embankment the water will pond and then increase the water infiltration into the radon barrier and also into the waste. The calculations of the amount of infiltration into the embankment do not account for the ponding of water on the top of the embankment.

To make matters even worse the new Class A and CAN cells are planning on using a new design which reduces the radon barrier from 7 feet to 2 feet. This creates a much more serious situation because a two foot drop in the surface of the cover creates a much more drastic result. Please refer to Attachment 7-4 to see the new design as it would be originally constructed. Now look at Attachment 7-5 to see what will happen if we have the same settlement issues in the Class A cell as we have already seen happen in the LARW cell (in 5 years, let alone 1000 years). After settlement similar to what we have already seen then water that flows through the lower filter zone will go directly into the waste. From there it will flow quite easily through to the liner which will also be cracked. From there the contaminated water will have a clear path off site. In other words, if we have the same type of settlement with the new design as we have seen in the LARW then we will have a complete failure of the cover system. One would hope that the new methods would be more effective than the previous methods; however this is not the case.

It is expected that we will see an even more dramatic effect from settlement in the Class A cell. Attachment 7-6 shows one of the many areas of concern in the Class A cell. If a line is drawn north and south along what is marked as the STA = 12 + 00 E line one can easily see that there are going to be huge settlement issues. Attachment 7-6(b) shows a cross section of this line. Included with this drawing is the location of H12 which was opened in the year 2000. The cross section also shows the huge concrete block marked as CWF Concrete 2001. One of the first thing that we notice is that the waste placement in this cross section is in direct violation of Energy Solutions permit. Energy Solutions LRA states on page 10 and 11 states "The cut and cover nature of the operation will preclude dramatic differences in waste column height and, accordingly, in settlement with the active embankment. The abnormal condition

considers possible effects of having a section of the embankment completed to cover height with an adjacent area of waste placement less than 25 feet high. ... The low height of 25 feet was chosen because this is the maximum calculated height of the embankment before preconsolidation stress is exceeded; in excess of this thickness, primary consolidation (settlement) begins to occur in the lowest layers of the embankment. This condition represents the maximum potential differential settlement for the liner." In other words the maximum difference in between areas where waste can be placed is 25 feet. Instead, Energy Solutions has constructed the cell with areas where the difference in heights of adjacent waste sections is 38 feet. (See Attachment 7-6 (red areas)).

Second the area of concerns in the LARW cell were at locations where the columns of waste were 25 to 30 feet in height. The area of concern in the Class A cell are at locations where the height of the waste will be 53 feet high. This means that the settlement would be expected to be twice as much in this area as in the LARW cell.

Third the area of concern will have the waste place very quickly. Energy Solutions themselves says that the reason that they had problems with settlement in their LARW cell is because they placed waste "quickly". In their 2006 Analysis of the LARW Settlement Monument Data their discussed why they "had differential settlement measurements ranging from 1.04% - 1.54%" that one of the areas was "located in the area of an old mobile waste cell that filled quickly, was closed quickly to meet year 2000 open cell requirements," Now they have even a bigger problem in the Class A cell. To meet the open cell requirements in this area the cell will need to receive over 40 feet of waste in less than two years. This will mean again that they are placing waste quickly to meet the open cell requirements.

The fourth area of concern is that in the LARW cell waste debris waste placed at either a 10 part soil to one part debris ratio or at least a 3 part soil to one part debris ratio. This was done to reduce the amount of differential settlement. In the new cell the ratios have now been changed to allow only one part soil to one part debris. This will again create more settlement than in the LARW cell.

The fifth concern is that the type of waste that is being accepted by Energy Solutions contains much more debris than the waste it accepted in the past. This added debris will decay, collapse, and be compacted more than the amounts of debris in the LARW cell. In addition, debris is now allowed in more portions of the embankment than in the past. There is only 1 foot of debris free waste required between the waste and the radon barrier. In the past debris was only placed in the bottom 2/3 of the embankment. This means more areas of debris in the embankment and more potential settlement, especially differential settlement.

So now let's review what Energy Solutions and the DRC agreed to do to try to make the settlement issue less of a concern. Back in 2003 Envirocare started using the new design and new ways to place wastes. They knew there were problems so they started working on ideas to improving the settlement problems. The idea was a step in the right direction. By August of 2005 a new approach was taken. It included three changes; 1) to install a temporary cover system that included settlement monitoring and 2) installing a shredder and rubbleizer to process all of the debris before it was placed, and 3) the use of surcharge materials to speed up settlement. The three solutions have provided little help and in fact have only created more violations and more issues.

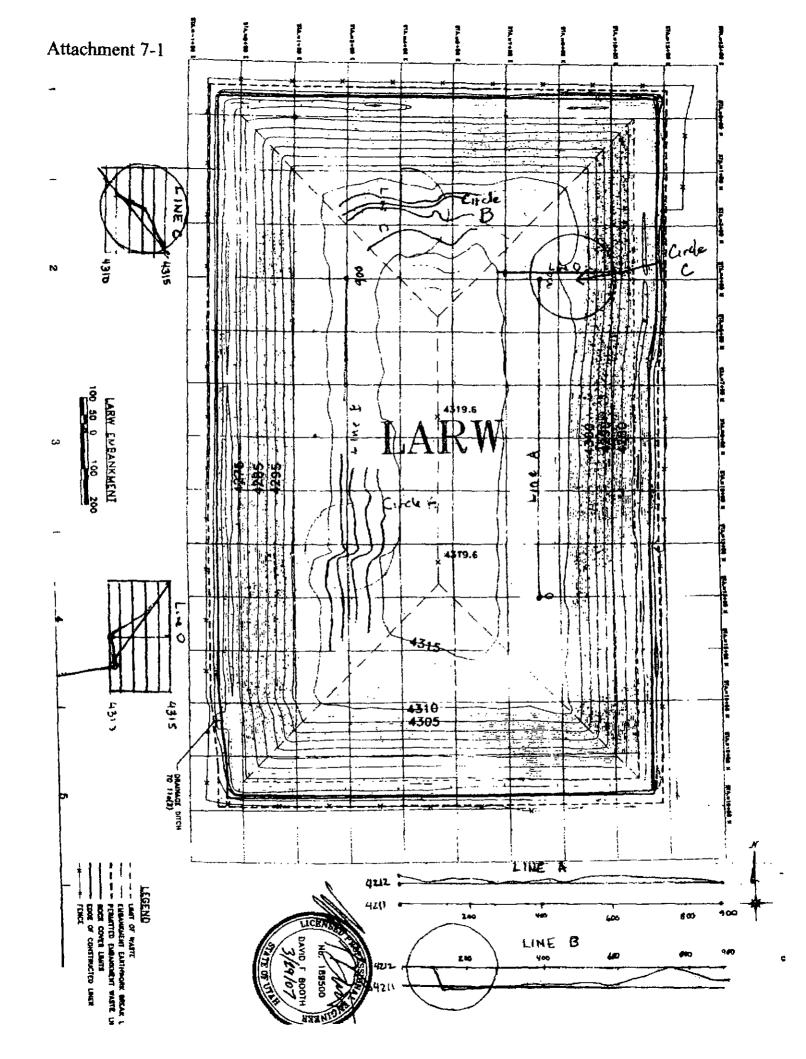
1) TEMPORARY COVER PLAN - The temporary cover plan is attached as part of Attachment 7-7 as part of a August 1, 2005 submittal from Envirocare. It states on page 3 "As waste areas become "topped out", temporary cover and settlement monuments will be installed and monitored as a step in preparing for permanent final cover." The temporary cover was to provide a place to install the settlement monitors and also provide three other important functions; prevent direct contact with the waste by personnel, reduce infiltration, and prevent potential airborne dispersion of the waste. Monthly inspections were to be conducted to check for erosion gullies and if gullies were found they would be reported in 5 working days.

All seemed to think that this was a great plan. Energy Solutions submitted reports to the State suggesting that they were incorporating this very important plan to monitor settlement, prevent erosion of the waste, prevent windblown material and prevent direct contact of waste with personnel. Attachment 7-8 is a submittal from Energy Solutions showing areas of Temporary Cover. Finally in May of 2007, after CME began to ask questions about the "canyons" in the Class A embankment the DRC requested some information from Energy Solutions about the temporary cover and the pre-final cover settlement monitoring. Three months later, the response came from Energy Solutions, Attachment 7-9 page 2 contains a shocking revelation from Energy Soltutions, "Erosion monitoring was not performed in 2006. Because the temporary cover has not been constructed and settlement monitoring has not begun in the Class A cell, erosion monitoring is not required..... Energy Solutions will address Class A pre-final cover settlement monitoring in the annual settlement report, once monitoring begins." So here we are, years later with no implementation of the temporary cover plan, no settlement monitoring data, no way to prevent direct contact with the waste by personnel, no way to reduce infiltration, no way to limit airborne contamination, no inspection done of the open waste pile. The temporary cover plan is a complete failure. Energy Solutions is in direct violation of many areas of it's license and yet the DRC seems to have done nothing

2. USE OF SURCHARGE PILES – this is another great idea but it has never been used. In fact the opposite has been done. Piles of waste material have been placed randomly on

top of the pile that have encouraged settlement in these random areas instead of areas where it would really be helpful. The surety only has monies for 500 linear feet of surcharge materials even thought there are many feet of areas that will really need surcharge when they are brought up to grade quickly. Please note the areas on Attachment 7-6 (red areas) where there are canyons between waste piles.

In summary the work that Energy Solutions has tried to do to improve the settlement concerns in the new cells have not helped much, if any at all. Instead there are many reasons to predict that the settlement issues will be even greater in the new cells than in the already constructed LARW cell. This will create major problems in conjunction with the new proposed 2 foot radon barrier. There is little doubt that unless something is done that the new cover systems will fail drastically.



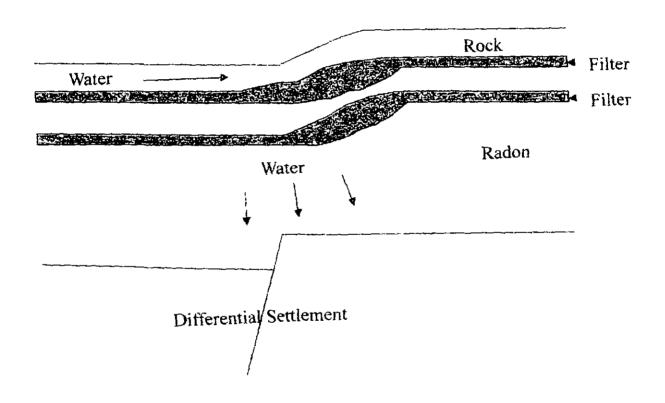
Attachment 7-2

LARW Cover Design

Rock	Filter Zone
Sac. Soil	Filter Zone
Radon Barrier	

Attachment 7-3

Area C as of 2006



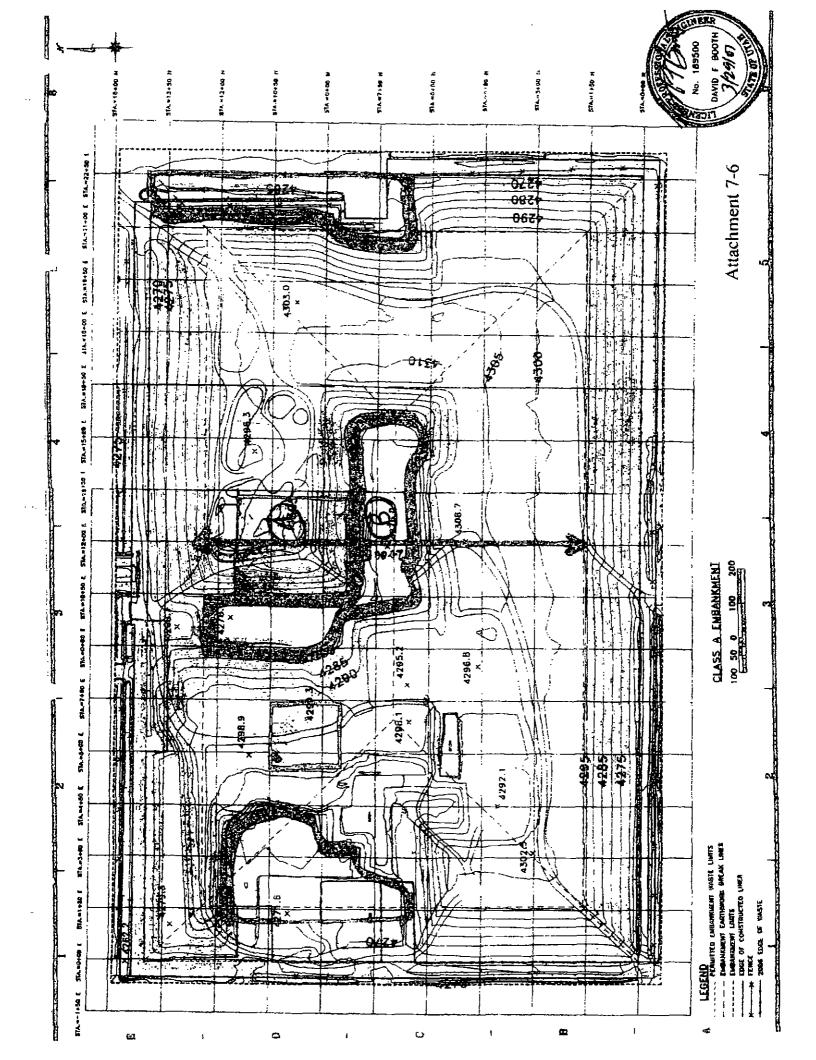
New Design As-Built Originally Waste Filter
Sacrificial
Filter Radon Rock Radon

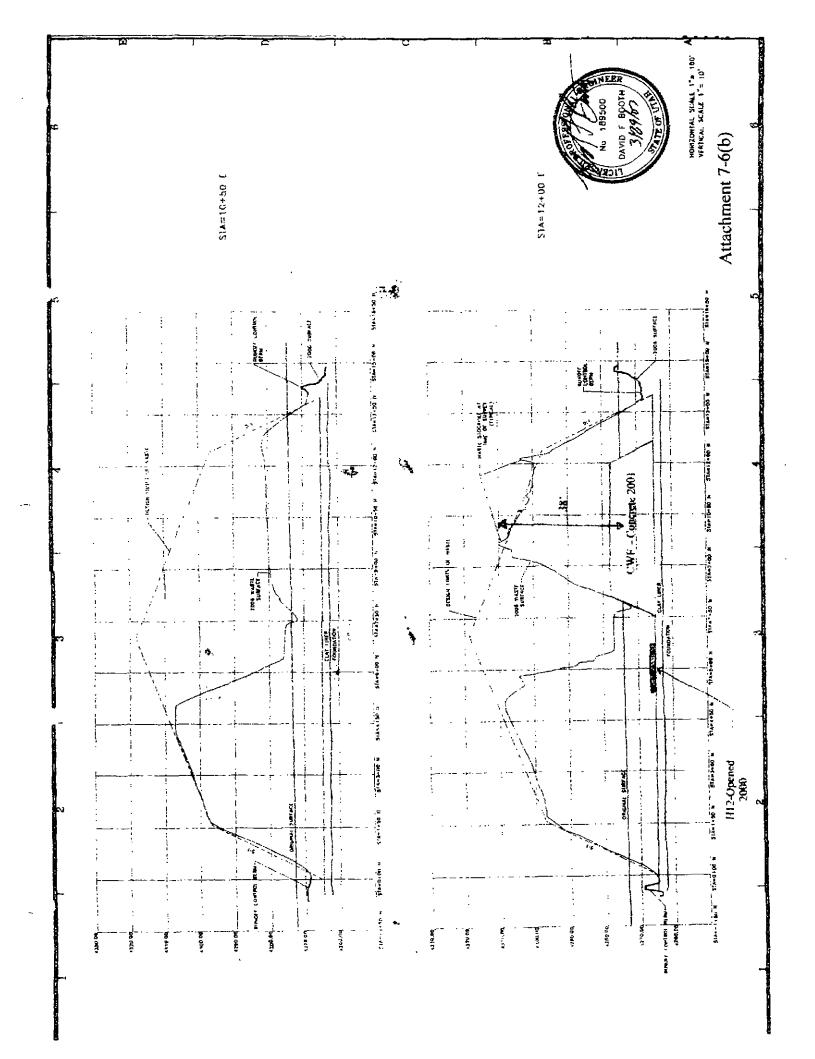
Attachment 7-4

-

Sacrificial 402 Radon Radon Waste Water Filler Service Filter Sacrificial Radon Rock Radon Flow Flow

Attachment 7-5 New Design After 5 Years





Attachment 7-7

SAPE AND SECURE

5.65 3.6°

CD05-0377

August 1, 2005

Mr. Dane Finerfrock
Executive Secretary
Utah Radiation Control Board
P.O. Box 144850
Salt Lake City, Utah 84114-4850

Re: June 9, 2005 Conditional Approval of Varian

DEL SUBSTITUTE OF PRINTING OF

CQA/QC Compaction Requirements

Dear Mr. Finerfrock:

In a letter dated May 25, 2005 (CD05-0270), Envirocare of Utah, LLC (Envirocare) requested that the Division of Radiation Control (DRC) review proposed revision 19a to the LLRW CQA/QC Manual as well as provide a variance to the current CQA/QC Manual to permit implementation of the proposed waste placement method. In a letter dated June 9, 2005, DRC provided conditional approval of the variance.

As a condition of the variance, Envirocare committed to responding to several items, including:

- w Schedule for installation of the shredder and rubbleizer
- ▼ Temporary cover plan
- ゴ Settlement monitoring report
- Future settlement monitoring plan
- Surcharging analysis

Attached please find a report addressing each of these items. Please contact me at 532-1330 with any questions regarding this submittal.

Sincerely,

Tye Rogers

Vice President of Compliance and Permitting

enclosure

cc:

Loren Morton, DRC (w/ encl.)

Woody Campbell, DRC (w/ encl.)



Engineering Department

Memorandum

To:

Dan Shrum, Sean McCandless

CC:

Tye Rogers,

From:

Steve Newton, P.E.

Date:

7/28/05

Subject

Response to DRC Letter Dated June 9, 2005

Presented below is a response to the Conditional Approval of a variance to the compaction procedures in the currently approved CQA/QC Manual. The responses are organized in the same manner as listed in the DRC letter.

Rubbleizer & Shredder Schedule

Envirocare has purchased a Komatsu 550 mobile crusher. This equipment is currently on site and being used in a test mode and for crushing rock in the unrestricted area. We anticipate the rubbleizer will be moved into the restricted area by August 31 for processing concrete type waste materials. Since it is a mobile piece of equipment, the location of the rubbleizer will shift along with the active waste placement area; however, the rubbleizer will always be located on protective material and above approved liner.

A Newell 120104 MegaShredder metal shredder was recently ordered and is being prepared for shipment to the Clive facility. Attachment 1 provides information about this equipment. Power system options are still being evaluated and will be decided upon soon. The shredder and power systems are major long lead time items, with the electric motor for the shredder having a 38-week lead time. The electric motor lead time is a firm date, and attempts to expedite that schedule have not been successful. In order to prevent potential delays in this 38-week lead time, the motor supplier will be subjected to expedited damages for any delays in motor delivery. The shredder facility design process has begun, and once the layout is complete, drawings will be submitted to the DRC. The estimated schedule for this piece of equipment and the supporting systems is presented below.

Submit shredder facility layout to DRC

Delivery of shredder components

Site preparation

Complete shredder foundations

Complete shredder mechanical systems

Motor delivery

Motor installation and facility start-up testing

As-built report to DRC

Shredder placed into service

September 15, 2005

August, 2005 to February, 2006

September to November, 2005

January, 2006

March, 2006

April 24, 2006

May. 2006

•

June 1, 2006

July 1, 2006

Temporary Cover Plan

Background Discussion

Our proposal and supporting rationale for placement of temporary cover is presented below. The proposal described herein is a component of our modified waste placement concept which involves reducing the overall area of waste placement activities compared to our past disposal practices. The new approach involves two active bulk waste placement areas. CLSM of large components and other items that may not be suitable for shredding and CWF will continue to be constructed as distinct waste placement approaches in separate areas. The main placement area will be used for all soil and debris wastes except material judged to be too wet for compaction. A second "wet waste" placement area will be available for drying and/or blending to make the wastes suitable for compaction. The size of each of these two areas will be between 150,000 and 250,000 square feet. The wet waste area may be used for general waste placement when there is no need to process wet waste material.

In general, the intent is to place waste in a systematic manner such that permanent embankment cover can be placed as soon as possible. A second goal is to build the embankments such that the open cell area is minimized and that the cell can be closed with a minimum of rework. To accomplish this Envirocare intends to complete the base of the current Class A cell, and bring all waste lifts up to the current design top of waste limits. Based on the current configuration of wastes within the cell, the remaining areas to be filled are the two "canyons" and in general the north side of the Class A embankment.

If and when the proposed height of waste increase has been approved for the Class A Combined embankment, the next and final major level of waste will be placed from the south, progressing to the north. As waste areas become "topped out", temporary cover and settlement monuments will be installed and monitored as a step in preparing for the permanent final cover.

Temporary Cover

Envirocare proposes to place temporary cover over waste areas that have reached the current permitted top of waste elevation. The purpose of the temporary cover will be to provide a surveyed surface for installation and monitoring of settlement monuments. The temporary cover will also prevent direct contact with the waste by personnel, reduce infiltration, and prevent potential airborne dispersion of the waste. Performance criteria for the temporary cover material and placement process would require that the material should not be readily eroded by wind or rain, and that the material should be compatible with the final cover system. This may be accomplished by the top foot of debris-free native soil called for in the current CQA/QC Manual, as further defined below.

The proposed temporary cover placement procedures are as follows:

- 1. Grade the waste surface to the design top of waste slopes and elevations allowing room for the temporary cover system.
- Place debris-free native soil material as temporary cover over the graded areas when a sufficiently large area is ready for cover (typically in 50,000 SF minimum lots). Suitable materials will consist of any native soils except those that are predominantly sand.
- 3. The temporary cover will be placed as a single 12" compacted layer. This layer will serve as and be designated as the last foot of "debris free waste".
- 4. Compaction will be performed and tested in accordance with the criteria for waste placement, as described in the CQA/QC manual.
- 5. Monthly inspections will be conducted to check the depth of erosion gullies. If the inspections indicate that any wastes are exposed by erosion gullies, the temporary cover will be repaired in those areas within 5 working days.
- Temporary cover maintenance will be performed on a bi-annual schedule and will
 consist of filling in any erosion gullies, and if necessary, placement and/or
 regrading of clean cover to prevent ponding on the temporary cover.
- 7. The edges of temporary cover will be marked with fencing, rope, snow fence, or other equivalent means to prevent heavy equipment travel on the temporary cover surface.
- 8. Since the final cover will be constructed over the temporary cover, no transitions at this interface will be necessary. However, each layer of the final cover will be stepped back to facilitate the future tie-ins.

Attachment 2 provides draft CQA/QC language for a new Work Element – Temporary Cover Placement and Monitoring. This draft is presented as revision 19d, building upon draft revision 19c submitted on July 19, 2005.

Settlement Monitoring Report

This section provides a discussion and interpretation of available settlement monitoring data and settlement predictions for embankments at the Clive Facility. Settlement data is available only for the completed portions of the LARW embankment, with data collection beginning in October 1999.

The interpretation presented herein is based on a recent combined embankment study performed by AMEC Earth & Environmental ¹ that was submitted to the DRC on May 27, 2005, in support of the proposed Class A Combined disposal cell. AMEC had access to the first four sets of data, which included annual elevation surveys performed on October 22, 1999, February 13, 2002, February 27, 2003, and January 23, 2004. They also had access to other survey data that was collected between the annual surveys. The most recent survey was performed on February 25, 2005 but this data was not available for AMEC when they were conducting their study. The most recent data has been included in the supplemental settlement evaluation discussed below.

Settlement of earthen materials is derived from three sources: (1) elastic compression which occurs immediately as material is placed; (2) consolidation settlement which occurs over a short period to a number of years; and (3) secondary settlement which occurs over many years. These types of settlement apply in varying degrees to both the waste column and the foundation soils. Further discussion is provided below, in the context of the site specific conditions at the Clive facility.

AMEC organized their report by two types of settlement: 1) settlements of the embankment and foundation due to loading of the foundation and 2) self-weight (compression) of the embankment materials themselves. In terms of final cover performance, AMEC indicated the most important portion of these settlements is the settlement that may occur after the final cover is placed.

Settlement Mechanisms

As a lead in to the settlement discussion, it is important to understand how the embankment materials (wastes) and foundation soils react to the pressures imposed by the waste. Since elastic deformations occur at the time of waste and cover placement, they do not contribute to future settlement of cover systems and are not discussed further herein.

The magnitude of settlement resulting from consolidation processes depends on the properties of the clay layers or clay like wastes, and the applied load conditions.

Page 4

¹ Geotechnical Study, Increase in Height and Footprint, Envirocare LARW Facility, May 27, 2005

Consolidation settlement begins once a load is applied to a saturated or near saturated clay system. Initially the load is supported by both the clay structure and water pressure that is developed within the voids between the clay particles. Consolidation takes place as the trapped water, which is under pressure from the applied loads, is slowly expulsed from the voids between clay particles.

At the time of initial loading, the rate of water expulsion (consolidation) is at its highest because the water pressure is at its highest. However, this release of excess water pressure from the clay voids is slow because clays have low permeability. As the water is slowly expulsed from the voids the applied loads are increasingly shifted to the clay structure, and the decreasing water pressure is accompanied by a decrease in the rate of consolidation.

The rate and length of time of settlement (consolidation) is largely influenced by the length of the paths that the trapped water must take to exit from within the clay layers. A thick deposit of clay that has intermediate thin drainage layers such as silt and sand stringers, will allow the water to exit rapidly. As will be discussed below, the subsurface conditions at the Clive facility and the settlement data to date indicate relatively quick consolidation of the soils and waste at the facility.

A third form of consolidation is referred to as secondary consolidation (which is in addition to the initial elastic compression, and primary consolidation) and this occurs long after the excess pore pressures have been dissipated. This component is usually smaller than primary consolidation and occurs as the clay particles slowly deform like plastic. Like primary consolidation, the rate of secondary consolidation decreases exponentially over time.

Subsurface Conditions

AMEC reviewed historical records, including the Vitro subsurface characterization, as part of their analyses for seismic and settlement evaluations for the Class A Combined embankment. In addition they commissioned additional Cone Penetrometer Testing to corroborate the past characterizations and to obtain a higher level of detail of the various layers within the main stratigraphic units beneath the embankments.

AMEC's review of the subsurface soils below the Clive facility indicates the soils are "sufficiently uniform that a single characterization is appropriate for either the individual or combined embankments." This alleviates any concern that there may be differential settlement due to a variable foundation condition. AMEC also indicates that characterizations and laboratory testing performed for Envirocare were consistent with the Vitro subsurface characterization.

Four subsurface units have been described in past studies and two units (# 4 and 2) have the potential to contribute to consolidation settlement. It is those two units that contributed to the predicted settlement in AMEC's analyses.

AMEC Conclusions on Foundation Settlement

AMEC points out that "Since the survey monitoring data could potentially be measuring both foundation and embankment settlements, the important aspect of calculating the foundation settlements was to identify the time required for the foundation settlements to be complete." AMEC performed their analysis using site specific consolidation test data and the FoSSA settlement analysis program which was used to model the four units and to also predict elastic and secondary settlements.

Their analysis indicated that foundation settlements will be on the order of 8 to 12 inches for the current embankment designs and 12 to 16 inches for a 50 foot high (at the slope breakover) combined embankment configuration. This magnitude estimate included the immediate elastic and short term consolidation components. Their interpretation of the site specific test data also indicated that about 95 percent of the consolidation would be complete within one year, or occur as the embankments are constructed. This relatively quick consolidation is due to the presence of favorable interlayering of drainage paths within the clay units, and the general absence of clay-like waste material.

AMEC also analyzed secondary consolidation by modeling this component over a 500 year period. They predicted that an additional 8 inches of long term settlement would occur during that period. Therefore, although approximately two feet of foundation actilement is predicted, 2/3 of this would occur writin and understand Furthermore, because of the broad uniformity or the foundation soil layers across the site, settlements of the foundation system would also be broadly uniform and not contribute to differential settlement of the cover systems.

AMEC Conclusions on Waste Column Settlement

AMEC indicated that the existing LARW embankment measured settlement data include contributions from both foundation settlement and waste column settlement. The proportion attributed to each cannot be distinguished from the settlement data alone. Observations by AMEC include:

- 1. The rate of settlement decreases significantly in a 12 to 24 month period.
- Foundation settlements and the elastic component of waste settlement are essentially complete by the time the final cover system is complete. Therefore, in general a majority of the movement that is registered by the settlement monuments would be considered as waste settlement.
- 3. The total magnitude of settlement over 4+ years is typically less than 0.75 feet
- 4. Given a maximum settlement of 0.75 feet and that settlement monuments are located about 100 leer apair, the largest amount of potential distortion would be 0.0075 versus the 0.02 criteria. Actual individual monument settlements and distortions are much smaller.

Additional Settlement Monument Data Discussion

The most recent data set suggests that all survey monuments settled an average of 0.32 feet in 2004. As a companson, the zone paint set indicates an average settlement of 0.15 feet. Most engineers with geotechnical experience would agree that this settlement pattern is not consistent with general soil or waste consolidation behavior.

It should be noted that there have been disturbances to individual settlement monuments, and several of the survey data sets appear to be affected by frost heave. The effect of these events make the data difficult to interpret but don't invalidate the general observations and conclusions of the overall monitoring program. In order to provide more reliable data in the future, Revision 18 of the LLRW QCA/QC manual provides for redesigned and refurbished settlement monuments to make them less susceptible to disturbance and frost problems in the future.

Even though there are some inconsistencies with the data, some general predictable behaviors can be observed. Attachment 3, Annual Settlement Monument Data Summery, includes a graphical representation of total settlement to date for each monument. The table and graph are organized by grouping the data into east west profiles, with monument numbers 5 and 6 being closest to the north south embankment centerline. For example, monument D5 and D6 are on the west and east sides of the centerline respectively. Monuments D4 and D7 are 100 feet further away from the centerline. Consequently, D5 and D6 are located over a taller waste column than D4 or D7, and even more so than D3 or D8. The actual monument locations are displayed on Figure 1 of the LLRW QCA/QC manual (included as Attachment 4). The data table in Attachment 5 presents additional readings for the 1999 to 2002 period, and is included for completeness.

Examination of the graph on Attachment 3 shows, as expected, that the greatest amount of settlement occurs under the tallest waste column which is near the center of the cell. Settlements decrease significantly for monuments near the edges of the embankment. Due to the data problems described above, the accuracy of the settlement magnitude may be in question, but the distribution is generally as expected.

Another representation of the data is included in the table Cross Section I Settlement Data (Attachment 6). The top part of this table presents all of the available elevation data for the monuments located on the Section I embankment cross section. The mid part of the table presents the incremental differences between the individual, chronological elevation readings. Examination of these incremental readings shows significant variability in the rate and direction of monument movement. Engineers would expect to see a consistent decrease in the rate of settlement, no upward movement of the monuments, and also expect less settlement further away from the embankment centerline. The inconsistencies in this data suggest possible frost heave issues with some data sets, and possible datum issues with other data sets.

The bottom section of the table presents a simplified analysis of potential additional settlement that may occur over the next three years. The presented numbers are based on taking the average individual monument settlement over the last three years and multiplying that result by three years. This is considered as an upper bound estimate. If the data were taken at face value, we would expect to see additional settlement of between 0.2 to 0.6 feet over the next three year period. However, based on typical consolidation behavior, the rates will decrease over time and the actual settlements would be less than shown in this example.

Future Settlement Monitoring Plan (Pre-final cover)

The primary goal of the pre-final cover settlement monitoring plan is to collect a sufficient amount of data to allow for interpretation of the changing rate of settlement and to reliably predict the time frame and magnitude of future settlements. These interpretations and predictions will be used to help establish the schedule for final cover construction. A second goal is to determine the earliest possible time to place the final cover without continuing settlements compromising the original design and long term embankment and cover performance criteria. The most relevant long term performance criterion is limiting differential settlement.

The essential elements of settlement monitoring plans include monument locations, time of installation, surveying frequency, and interpretation and reporting procedures. All of these elements were updated in 2005 for monitoring the completed final cover system, and that plan is fully described in Revision 18 of the CQA/QC plan. Settlement monitoring for areas with temporary cover, referred to as the pre-final cover plan, mirror the final cover plan with the following changes:

- 1. Pre final cover settlement monuments will be installed as temporary monuments and will be located as close as practical to the final monument locations.
- 2. The pre final cover temporary monuments will be installed with their base located at the base of the final one foot temporary cover layer. This depth of embedment is expected to secure the temporary monument and protect it from frost heave in all but the most extreme winter seasons.
- 3. The pre final cover temporary monuments will be installed and surveyed within 30 days of placement of the temporary cover.
- 4. New monuments will be surveyed again at 2, 4, 8, and 12 months, then semi-annually until the final cover system is placed.
- Reporting and analysis of settlement data will be compiled annually, and will be provided along with the annual embankment as-built reports.
- Immediately prior to placement of the final cover, the temporary monuments will be removed.

Page 8

Attachment 2 provides draft CQA/QC language for a new Work Element — Temporary Cover Placement and Monitoring. This draft is presented as revision 19d, building upon draft revision 19c submitted on July 19, 2005.

The determination of when to build the final cover will be based primarily on when potential future differential settlements will be small enough to not compromise the final cover system. The evaluation of future differential settlements will be based on plotting the individual settlement monument data over time, and using a curve fitting method to extend the curve into the future. The individual monument data sets will be projected a minimum of three years and the projected settlement for each monument will be compared to all adjacent monuments. Once the projected differential settlement between adjacent points results in a distortion of less than 0.01 (half of the design criteria for the embankment), the respective embankment areas will be considered ready for final cover.

It should be noted that embankment areas with temporary cover will be re-graded to the original design grades prior to placement of final cover. This ability to re-grade the top of the embankment after the majority of total and differential settlements are complete will allow the final embankment to remain at or near the design configuration

Surcharging Analysis Report & Plan

Surcharging of embankment materials would be a potential action only if the anticipated decrease in the rates and magnitudes of settlements were not occurring as predicted or as needed to achieve tolerable future differential settlements. To be more specific, broad uniform settlement of the embankments would have little effect on the final cover system, in the settlement of the embankments would have little effect on the final cover system, in the settlement within the waste material would be the only trigger that would initiate surcharging of the embankments.

Conditions That Could Trigger Surcharging

Surcharging of waste materials would only be necessary if one or more of the conditions below are met. It should be noted that it is impractical to be numerically specific about a certain differential settlement rate or time frame that would trigger the need to apply a surcharge. Likewise, the amount of surcharge material to apply would depend on the preferred speed and magnitude for achieving the desired results. It should be noted that the survey monument data to date indicates only small to moderate differential settlements, and it is not anticipated that surcharging would ever be necessary if there was a year or more to allow settlements to occur and to diminish.

 If observed settlement rates and or magnitudes at some locations were not decreasing at similar rates when compared to the majority of other settlement monument locations.

- 2. If excessive subsidence were observed between monuments. Excessive subsidence is described as exceeding distortion of 0.01 between two monuments.
- If the predicted decrease in rate and magnitude of settlement at various points would not allow for placement of the final cover system within the desired time frame for cover construction.

Surcharging Approach

- Define the desired schedule for final cover construction, whether for sub areas or the overall embankment.
- 2. Using settlement data to date, predict the amount of additional time to achieve future differential settlements of less than a one percent distorton criteria.
- 3. Evaluate the time available for achieving the necessary additional settlement and define the amount of surcharge material needed to complete the desired settlement within the necessary time frame.

Attachments:

- 1. Kornatsu 550 Mobile Crusher and Newell 120104 MegaShredder information
- 2. Draft revision 19d of the CQA/QC Manual
- 3. LARW Annual Settlement Monument Data Summary
- 4. Figure 2 of the CQA/QC Manual
- 5. LARW Settlement Monument Data 1999 to 2002 Detail
- 6. Cross Section I Settlement Data

Attachment 1

KOMATSU® BR550JG-1

FLYWHEEL HORSEPOWER 228 kW 306 HP @ 1950 rpm

OPERATING WEIGHT 47500 kg 104,720 lb



BR 550

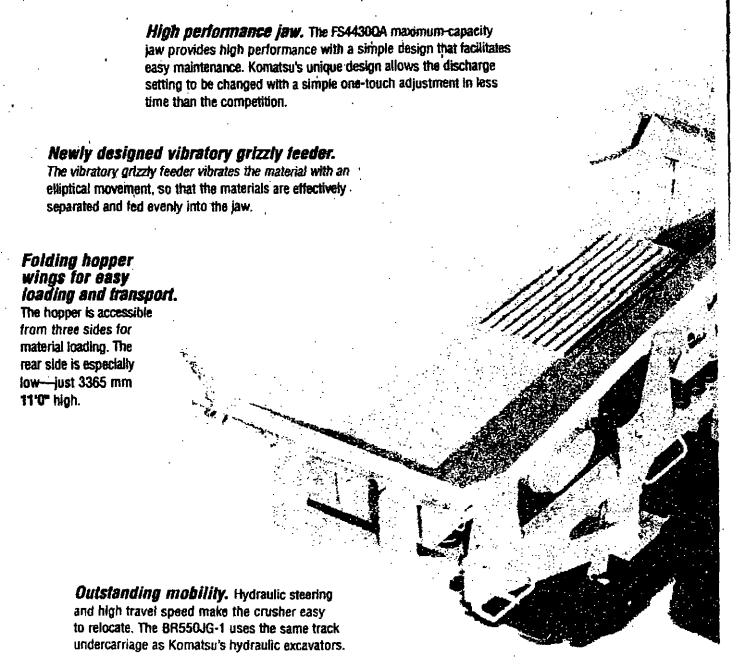


Mobile Crusher

BR550JG-1 Mobile Crusher

Komatsu's newly designed BR550JG-1 enters the market as the most technologically advanced machine available. With excellent crushing power and a production capacity of 100–460 ton/h 110–507 U.S. ton/h, the Komatsu BR550JG-1 is the optimum choice for your work site.

Rotating lamp flashes to indicate travel mode, excessive load on crusher or abnormal condition.



HydrauMind hydraulics and all-hydraulic drive system.

Fully hydraulic drive system gets you working right away. HydrauMind system supplies the optimal amount of oil through load-sensing and pressure-compensated valves.



FLYWHEEL HORSEPOWER 228 kW 306 HP @ 1950 rpm

> OPERATING WEIGHT 47500 kg 194,720 fb

PRODUCTION CAPACITY 100–460 ton/h 110–507 U.S. ton/h



High-speed, large-capacity conveyor belt.

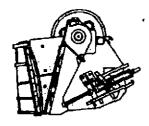
A 1050 mm 42" wide belt moves at 120 m 394' per minute. The discharge height is 3000 mm 9"16".

Komatsu's SAA6D125E-2 engine provides 228 kW 306 HP @ 1950 rpm for maximum crushing power while keeping exhaust gas, noise, and vibration to a minimum.

Hydraulic conveyor lifter at the high position ensures adequate ground clearance when driving, and ample jaw discharge clearance when in the operation mode.

Sprinkler nozzle and a connector are standard.

Emergency shut-off buttons are installed on both the left and right sides of the chassis, control panel, and radio remote control (optional).

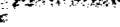


Designed with the operator in mind. the crusher offers the most up-to-date technological advancement to assist with your crushing needs.

Equipped with FS4430QA Jaw Crusher

The powerful FS4430QA jaw crusher with bow-type fixed jaw at high rpm allows you to adjust setting ranges from 55 mm to 200 mm 2.2"-7.9" (OSS) for maximum crushing capabilities, including concrete debris and hard rock. Komatsu's one-touch discharge setting adjustment also allows greater control over your crushing capacity.





FS4430CA Jaw



GAP Angust Cymrin

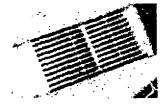


Addustment Solte is

- Maximum crushing efficiency. The Kometsu semiautomatic feeder system senses the load on the crusher and adjusts the feed rate accordingly to maximize efficiency for all types of rock and concrete debris.
- Newly designed vibrating grizzly feeder. By mising the feeder angle to an Incline of 4° the muck is more effectively removed and the elliptical movement of the 2-stage grizzly feeder reduces clogging. Also, en optional muck conveyor le evallable to separate the materials,
- High-speed, large-capacity conveyor belt. A 1050 mm 42" wide belt moves quickly to discharge crushed meterials. Discharge height is 3 m 9°10", which facilitates stocking and screening the products.



Load-selling Go. how East



erzottestype Gentry Bat



Production Capacity

Maximum production capacity" (with a muck content of 30%).

Unit: tooft U.S. tooft

Crysher Discharge Selling (apon side)					
Material	1 _ 1 _ 1 _ 1 _ 1 _ 1 _ 1		100 mm 2_9*	150 mm 5.6	200 mm 7. 9 *
Natural stone	_	_		200-280 220-388	
Concrete debris	100-140 118-154	110-160 121-178	150-220 165-243	230-330 254-354	320-460 353- 507

The production capacity of the natural stones shown in the table is based on andesite having unconfined compression strength of about 1000 kg/cm² 14,225 pel, that of the concrete debris is based on concrete debris containing no steel bers and all the meterial is assumed to be dry and equal to or eller than the optimum feed-in material size.

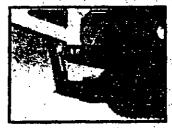
The production capacity is the sum of the quantity of the material crushed by the crusher and the quantity of the material that passed through the grizzly bar. It depends on the type and properties of the material and the working condition.

When the counter discharge setting is 55-100 mm 2.2"-3.9", only concrete debris can be cruehed.

 High mobility. The overall height for transportation is reduced below 3.4 m 11°2" by employing hydrautic cylinders to fold the hopper. The BR550JG-1 has high ground clearance. The hydrautic conveyor lifting function ensures ample ground clearance when relocating the machine. The optional radio controller allows remote control travel functions.



Folding Liberies



Litting | carrier, ul Conveyor

Maximum Reliability and Minimal Maintenance. Kometsu equipment offers exceptional reliability and the leading edge in technological advancement. The new monitoring system improves maintenance, while standard features such as the pre-cleaner and double cleaner element are installed to improve dust resistance. A large cleaners under the crusher means easier maintenance. Even if trouble occurs it can be repaired in a short time.

Cornfortable Design, in addition to a low-noise engine made with sound-absorbing materials, Kometsu installs low-speed and high-torque hydraulic pumps, a muffler, and other standard parts to reduce noise and vibration, in addition, every crusher is equipped with a standard water sprinkler nozzle to suppress dust and improve the environment.

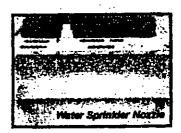
Easy Operation. The Mobile Crusher offers high-performance functions. The crusher setting can be completed in 3 minutes with the easy setting adjustment mechanism. The crusher, feeder, discharge conveyor belt, and optional equipment can all be operated at the touch of a button. With the optional remote control, operator control is maximized.

Safety

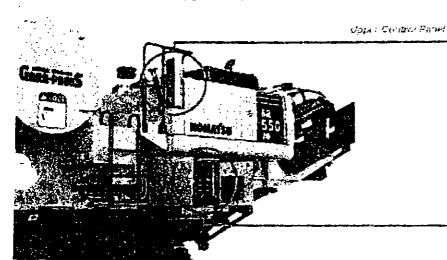
- Emergency shut-off buttons are located on the left and right sides of the chassis, on the control panel, and the remote control (optional).
- A rotating temp flashes when there is a malfunction on the monitor display (for example, when overheating occurs) and the operator is also alerted by a buzzer in the event of an abnormal shuf-down on the conveyor balt or optional equipment.
- A switch is provided to change between crushing and travel modes.
- Handralis and safety guards are provided for all sections.















ENGINE

	Komeitsu SAA6D125E-2
Type	4-cycle, water-cooled, direct injection
	Turbocharged and aftercooled (air to air)
Number of cylinders	
Bore	125 mm 4.92"
Stroke	150 mm 5.91"
Piston displacement	11.04 ftr 674 in ³
	. 228 kW 306 HP @ 1950 rpm (SAE J1349)
Governor	



HYDRAULIC SYSTEM

	Type Verisi	ble capacity with pistons (inclined plate type)
	Mein pump:	
	Type	
	Pumps for	. Travel, crusher, conveyor, and options
	Maximum flow	2 x 310 kr/min 2 x 82 U.S. gpm
	Maximum pressure	380 kg/cm² 5,405.5 psi
٠	Maximum travel speed	

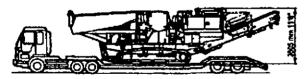
Hydrautic system (travel, crusher, feeder,	conveyor, and option):
Trevel	. 220 ltr/min 58 U.S. gpm
Crusher	. 325 kr/min 86 U.S. gpm
Feeder	. 110 ltr/min 29 U.S. gpm
Main conveyor	90 ttr/mln 24 U.S. gpm.
Muck conveyor	47 ltr/min 12 U.S. gpm



TRANSPORTATION



Condition after rotary temp assembly, muffler, pre-cleaner, and mirror assembly are removed.



Condition efter only rotary lamp and muffler are removed.*
(In some districts, the machine may need to be disassembled for transportation.)

Transport length	13430 mm	44'1"
Transport height	3395 mm	117
Transport height"	3505 mm	11'6"
Transport width	2995 mm	9°16"

^{*}Condition after only rotary lamp and multier are removed



OPERATING WEIGHT



CRUSHER

Jaw	Komatsu FS4430QA
	1120 mm x 766 mm 44" x 30"



GRIZZLY FEEDER

Frequency	Meximum 1000 opm
Size	1125 mm x 4105 mm 44" x 13'6"
Drive type.	Hydraulic gear motor



UNDERCARRIAGE

Seal of track	Sealed track
Track adjuster	Hydraulic
Number of shoes	
Number of carrier rollers	sets/one side
Number of track rollers	



COOLANT AND LUBRICANT CAPACITY

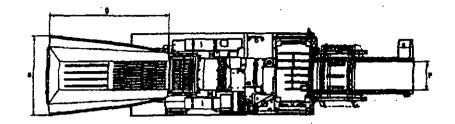
Fuel tank	. 605 AT	160 U.S. gal
Rediator	43.9 Hr	12 U.S. gal
Engine		
Final drive, each side		
Hydraulic system	. 370 km	98 U.S. gal



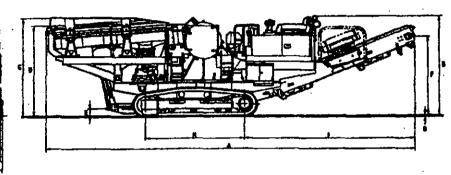
DIMENSIONS

When Operated



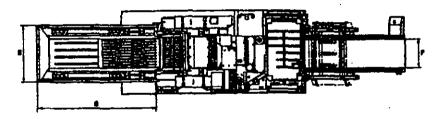


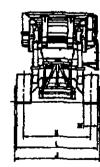


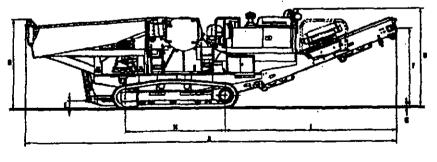


When Hopper is Folded









A	Overali length	13 430 a	nin	44"1"
В	Overall height	3540 F	HHI)	11717
C	Feed heightside	3640 n	TIET	11717
D	Feed height-reer	3365 n	THAT	11*
Ε	Minimum ground clearance (during travel)	350 n	nsi)	17
F	Discharge height	3000 n	1981)	9"10"
G	Track thickness	30 n	nan	7*
Н	Length of track on ground	3700 n	TH/TI	127
1	Discharge from idler center	6145 m	13161	28.2

j	Overall width	3115 mm	18'3"
K	Track gauge	2480 mm	6.5.
Ĺ	Track width	2960 mm	17
M	Shoe width	500 mm	19.7
N	Hopper width Hopper width when folded	2805 mm 2130 mm	97 70
0	Hopper length	4365 mm	14'4"
P	Discharge conveyor belt width	1050 mm	42"



STANDARD EQUIPMENT

ENGINE:

- Engine, Kometsu \$AA6D125E-2
- 4-cycle, water-cooled, direct injection, turbocharged, and effectooled (air to air)
- Nel horsepower 228 kW 366 HP
 1950 rpm
- Fuel system:
 - -Fuel, light oil, ASTM specification -Governor, centrifugal method,
- # Cooling fan, suction type
- Air cleaner, centrifugal method with paper filter

ELECTRICAL SYSTEM:

- Starting motor, 11 kW 24 V
- · Alternator, 50 ampere 24 V
- Bettery, 140 Ah 2 x 12 V

UNDERCARRIAGE:

- Number of rollers:
 - --Upper carrier, two sets/one side --Lower track, five sets/one side

SHOES:

- Assembled triple-grouser type, 500 mm 18.7"
- Tension adjustment, grasse cylinder method (cushion aprings attriched)

CRUSHER:

- Type, FS4430QA single-toggle crusher
- Size, 1120 mm x 765 mm 44" x 30"
- Rotation, 210–300 rpm
- Drive method, hydraulic motor with V-belt

FEEDER:

- Type, 2-step deck
- Speed-controlled grizzly feeder
- Dimensions (W x L), 1125 mm x 4105 mm 44" x 13"6"
- Grizziy bar opening, 45–70 mm 1.77*–2.76*
- Drive method, hydraulic gear motor

BELT CONVEYOR:

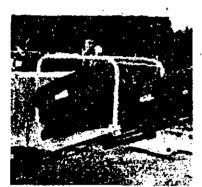
- Width x length, 1050 mm x 10135 mm
 42" x 33"3"
- Speed, 120 m/mln 394 ft/mln
- · Drive method, hydrautic piston motor



OPTIONAL EQUIPMENT

MAGNETIC SEPARATOR:

 Magnetic separator for primery conveyor, 900 mm 35" wide



Magnetic Separato:

MUCK CONVEYOR:

 Muck conveyor sessibly can be folded by hydrautic cylinder, 4000 mm x 600 mm 13"1" x 2"



Muci Conveyor

RADIO REMOTE CONTROLLER:



Function:

- Travel Left/Right/ Forward/Reverse
- Crusher On/Off
- Feeder On/Off
- One-Touch
 Deceleration On/Off
- Emergency Shutoff
- Hom

Pleanute un rondler

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Komatsu America International Company 440 N. Fairway Dr., Vernon Hitla, E. 60061

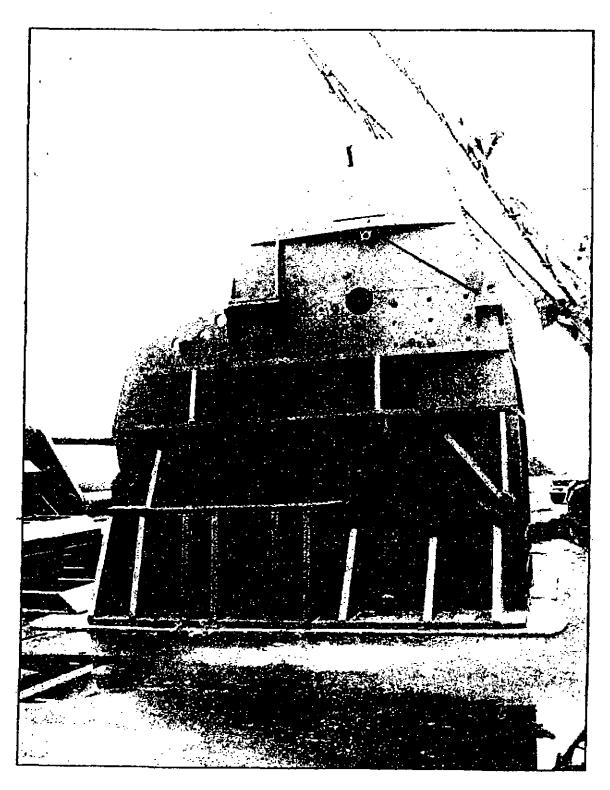






WENDT CORPORATION

2080 MILITARY ROAD, TONAWANDA, NY 14150-6765 USA Telephone: 716-873-2211 Fax: 716-873-9309 web site: www.wendecorp.com crusil: sales@wondecorp.com

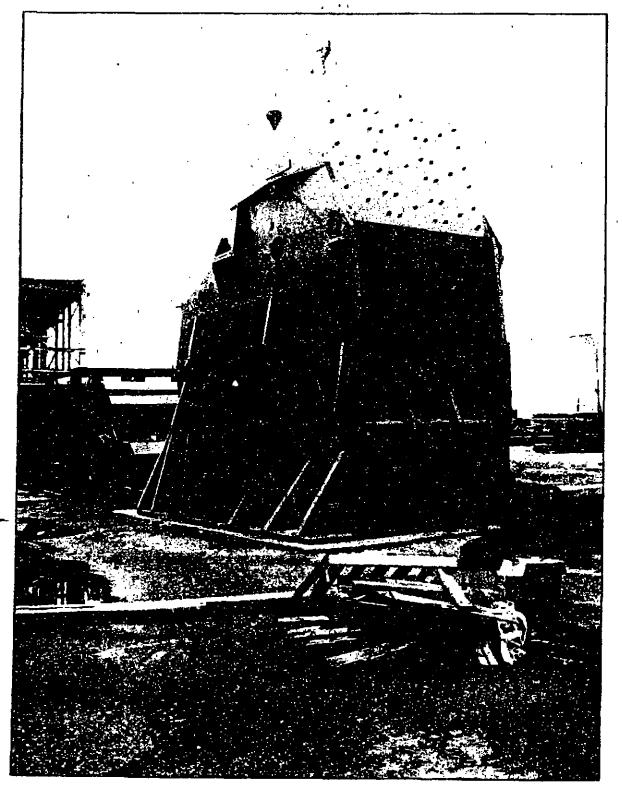






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web site: www.wendtcorp.com

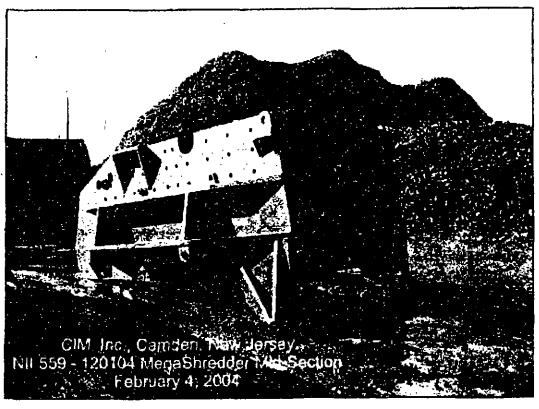
CIM, Inc., Camden, New Jersey NII 559 - 120104 MegaShredder Double Feed Roll February 4, 2004 Frank Flyct Arms -

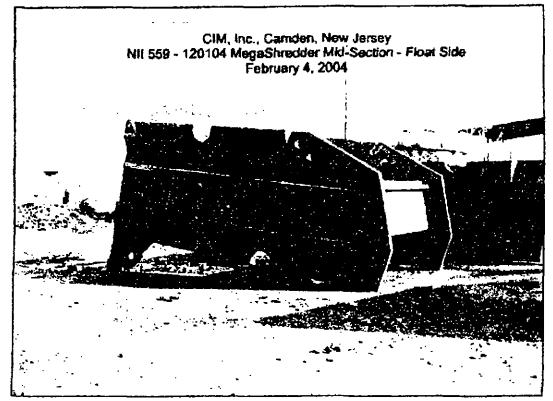




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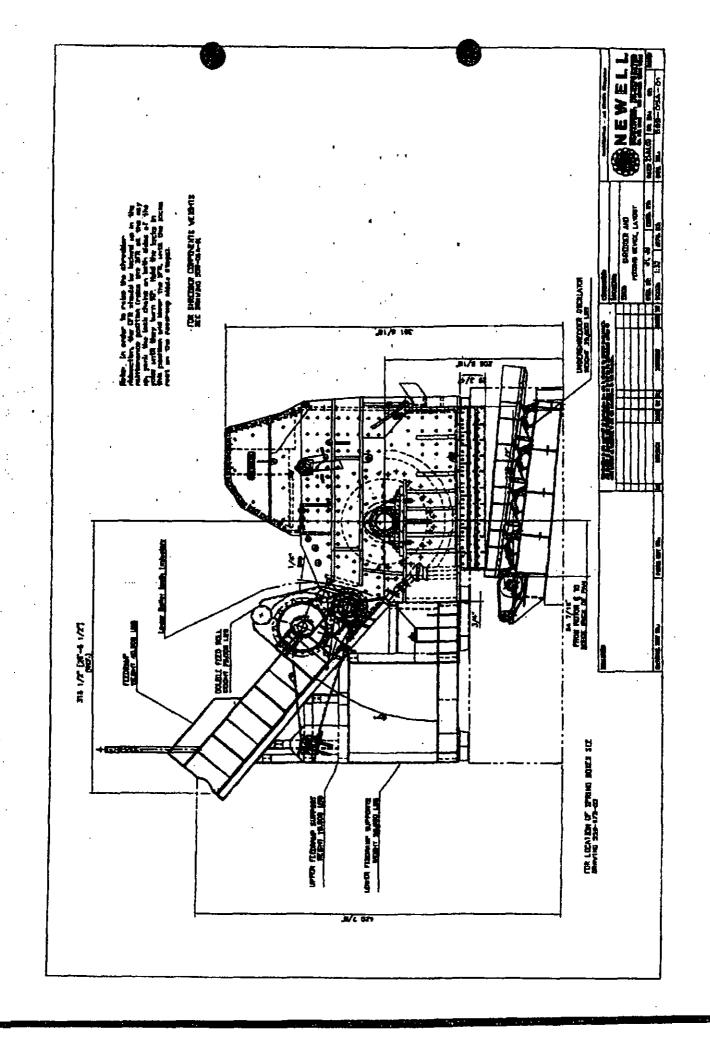
2080 MILITARY ROAD, TONAWANDA, NY 14150-6765 USA Telephone: 716-873-2211 Fax: 716-873-9309 web site; www.wendteorp.com email: sales@wendtcorp.com

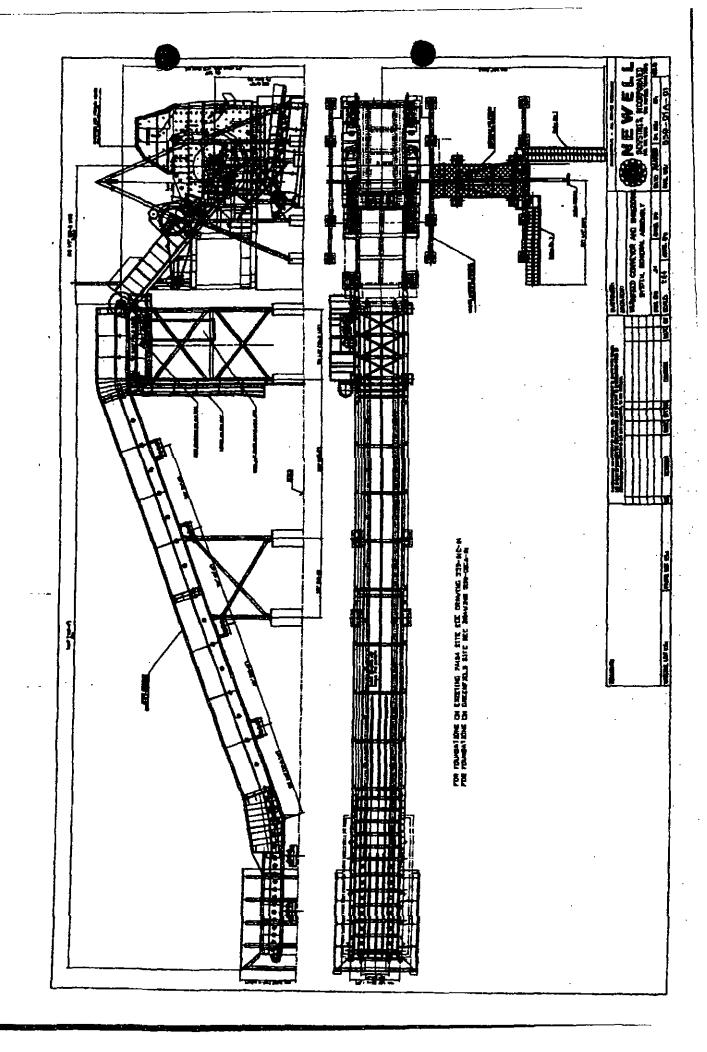
CIM, Inc., Camden, New Jersey
NII 559 - 120104 MegaShredder Undermill Oscillator
February 4, 2004

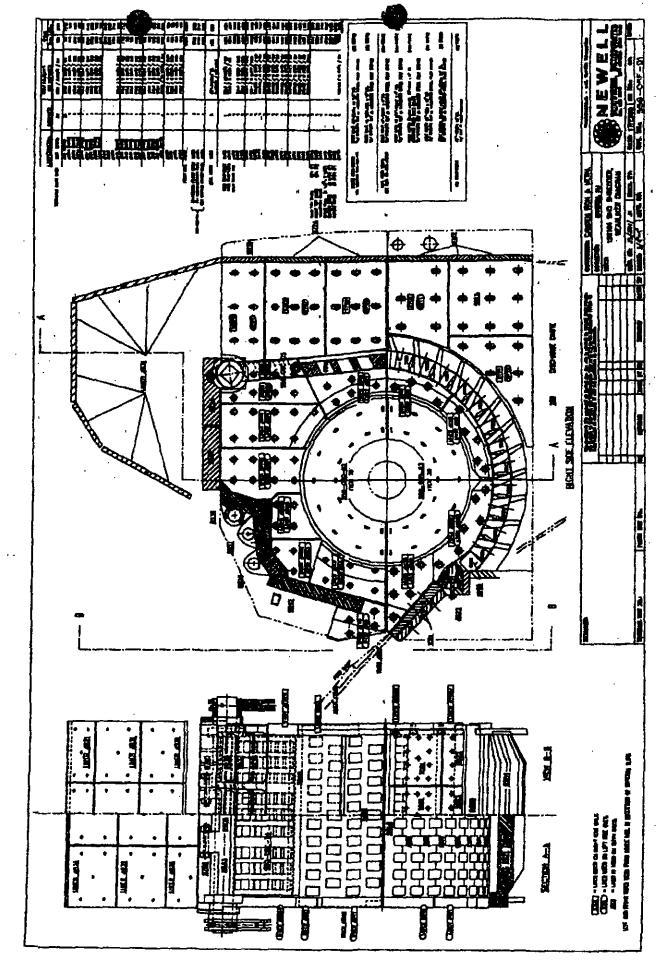
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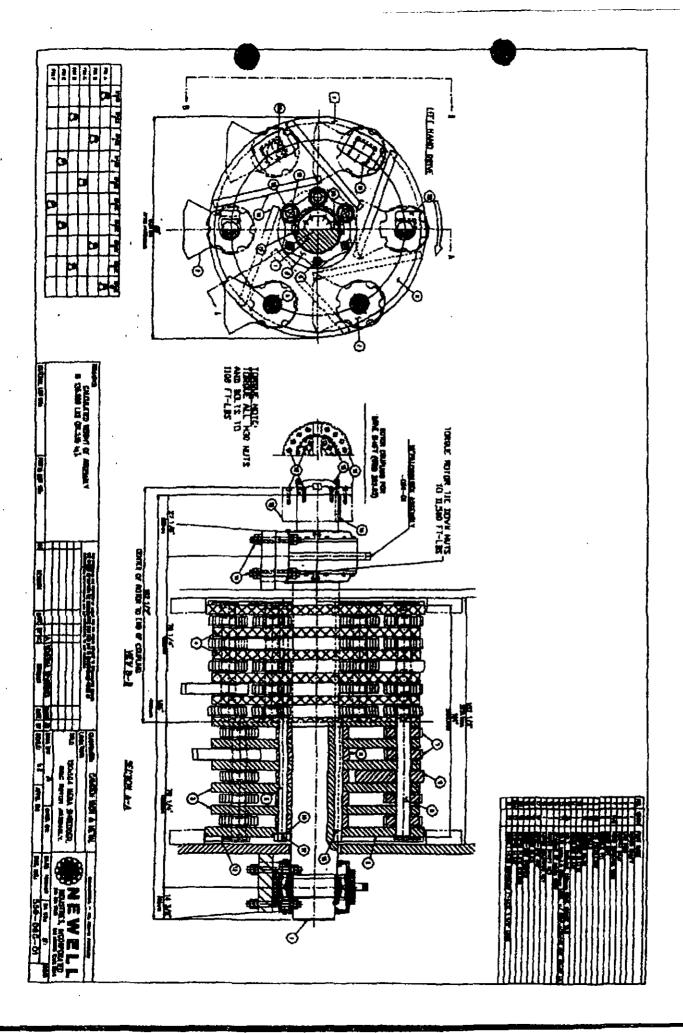
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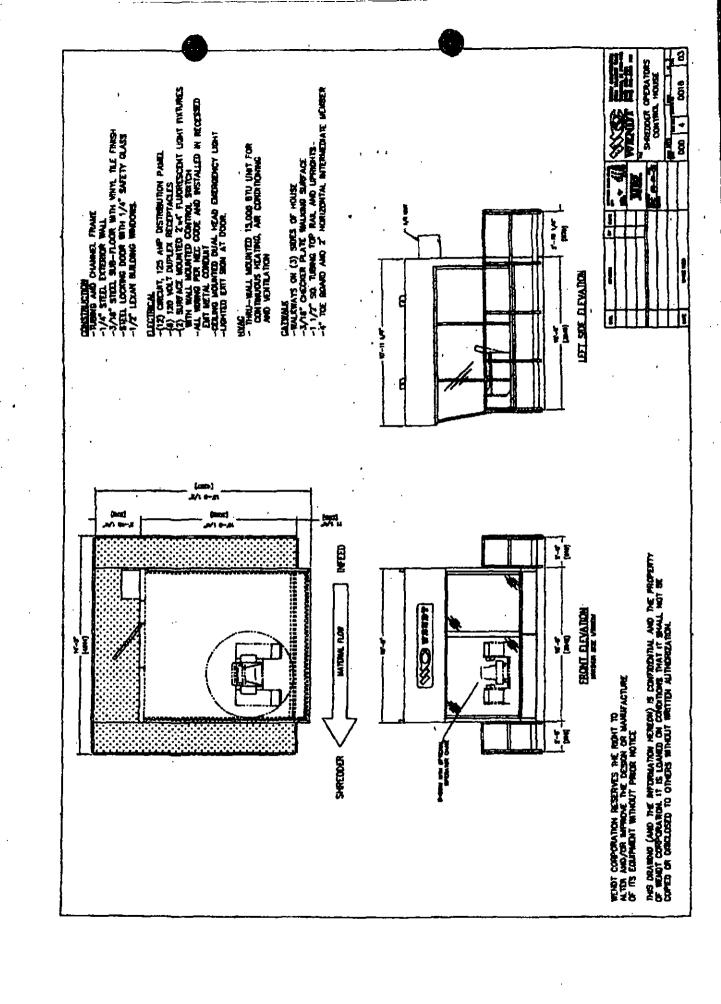
total - # 807,000 #-403.5 tous

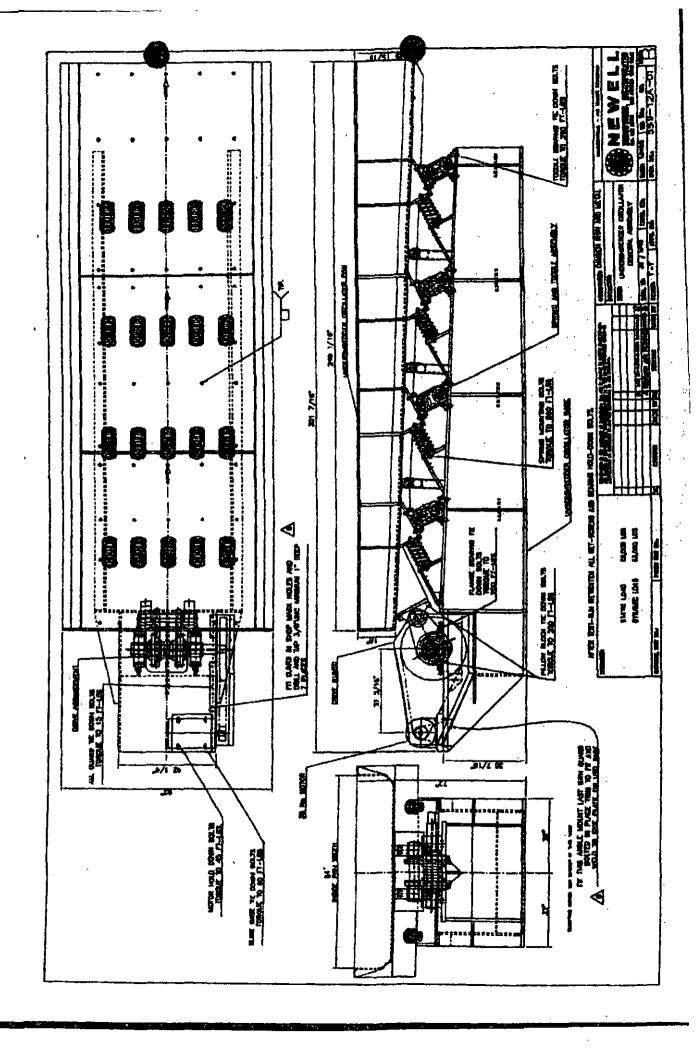












Attachment 2

ATTACHMENT II-A - CONSTRUCTION PROJECT PLAN FOR LLRW EMBANKMENT TABLE 1 - QA/QC ACTIVITIES WORK ELEMENT - TEMPORARY COVER PLACEMENT AND MONITORING

SPECIFICATION

QUALITY CONTROL

QUALITY ASSURANCE

TEMPORARY COYER MATERIAL: Temporary cover shall be native soils except those that are predominantly sand.

Visually inspect temporary cover soils.

No activity.

TEMPORARY COVER PLACEMENT: Temporary cover shall be placed in lots. Let size will be a minimum of 50,000 st. Temporary cover shall be placed within 30 days, of reaching the design top of waste elevations and grades for each lot.

Document lift area, location, thickness, and compaction Periodically observe lift approval documentarion. on the Lift Approval Form

Temporary cover shall perform as the Debris Free Zone specified under Work Element - Waste Placement, above, Temporary cover shall be placed in accordance with the lift thickness and compaction requirements specified under Work Element - Waste Placement, above.

The edge of the temporary cover shall be marked with fencing and rope, snow fence, or equivalent marking to prevent heavy equipment travel on the temporary cover surface.

A commercial fixative product or magnesium chloride may be applied to the surface of the temporary cover to aid in dust compol and erosion prevention.

PRE-FINAL COVER SETTLEMENT MONUMENTS: Pre-final cover settlement monuments shall consist of approximately 18-inch long #5 or greater rebar that is welded perpendicular to a metal plate. The metal plate shall be approximately 18 inches square with a thickness of 3/16 inch to 1/4 inch. The metal plate shall be placed on the top of waste surface and then secured by the temporary cover as it is placed. Each monument shall be labeled, flagged, and documented on

Inspect pre-final cover settlement monuments for compliance with the specification prior to installation.

Perform a surveillance of monument installation activities.

II-A - pg. 52 of 83

ATTACHMENT 11.A - CONSTRUCTION PROJECT PLAN FOR LLRW EMBANKMENT TABLE 1 - QA/QC ACTIVITIES WORK ELEMENT – TEMPORARY COVER PLACEMENT AND MONITORING

QUALITY CONTROL

SPECIFICATION

QUALITY ASSURANCE

a reference drawing

PLACEMENT: Pre-final cover sentement monuments PRE-FINAL COVER SETTLEMENT MONUMENT shall be placed as close as practical to the locations of final cover settlement monuments identified in Figure 2. SURVEY REQUIREMENTS: Surveys shall be rerformed with GPS or approved equivalent equipment. Tolerance shall be no more than ± 0.1 foot.

days); then semi-unqually until final coyer construction begins. Weather conditions at the time of the survey and a discussion of the potential for frost to be present shall SURVEY INTERVAL: The pre-final cover settlement monuments shall be surveyed within 30 days of surveyed again at 2, 4, 8, and 12 months (± 10 calendar temporary cover installation. New monuments shall be be documented in the survey report NSPECTIONS: Monthly, inspect temporary cover for indicates that waste material is exposed due to erosion, the temporary cover shall be repaired in that area within the presence of erosion gullies. If the inspection 5 working days.

Maintenance shall consist of filling in any erosion gullics Semi-annually, maintain the temporary cover surface. and, if necessary, re-grading to prevent ponding on the lemporary cover REPORTING: Survey data for pre-final cover settlement monuments shall be compiled and analyzed to evaluate total and differential settlement. This data and malysis shall be submitted to DRC with the annual as-

Verify that surveys have been performed. Perform and document a post-construction survey of the pre-final cover sellement monuments.

Calibrate and operate survey equipment in accordance with the manufacturer's recommendations.

Perform and document the required surveys. Provide survey data to the Director of Engineering.

Verify that monument surveys are completed as required.

Perform and decument monthly inspections.

Document any areas requiring filling or re-grading. nvaintenance semi-amina Document

REVISION: draft 19de

ATTACHMENT 11-A - CONSTRUCTION PROJECT PLAN FOR LLRW EMBANKMENT WORK ELEMENT - TEMPORARY COVER PLACEMENT AND MONITORING TABLE 1 - QAQC ACTIVITIES

SPECIFICATION

QUALITY CONTROL

QUALITY ASSURANCE

built report.

TRANSITION TO FINAL COVER: immediately prior to placement of the first lift of radon barriet, the pre-final cover settlement monuments shall be removed and the temporary cover surface restored.

moniments have been removed prior to final cover Inspect and document that all pre-final cover settlement construction.

Verify that pre-final cover seutlement monuments have been removed and that the temporary cover surface meets design top of waste grades and elevations.

> Additional clean debris-free soil material shall be placed as needed to return the area for final cover construction to the original top of waste design grades and elevations.

Survey and dixument the temporary cover surface to confirm that the top of waste design grades and elevations are actieved. Attachment 3

Attachment 6

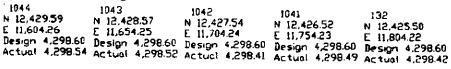


ATTACHMENT 3

4444444444444444444

AWB12/B13

Top Of Waste Survey 2-6-02 (Page 2 of 42) 12-6-02



1016 N 12,391.63 E 11,503.61 Design 4,297.00 Actual 4,296.80 1015 N 12,381.64 E 11,503.44 Design 4,295.00 Actual 4,294.73	1029 N 12,380.62 E 11,553.43 Design 4,295.00 Actual 4,294.76	1030 N 12,379.59 E 11,603 42 Besign 4,295.00	1011 N 12,378.57 E 11,653.41 Design 4,295.00	1037 N 12,377.55 E 11,703.40 Design 4,295.00	1039 N 12,376.53 E 11,753.39 Design 4,295.00	129 N 12,385.51 E 11,803.55 Design 4,297.00 Actual 4,296.61 120 N 12,375.51 E 11,803.38 Design 4,295.00 Actual 4,293.84
1014 N 12.331.64 E 11,502.60 Besign 4.285.00	N 12,330.62 E 11,552.59	1028 N 12,329.60 E 11.602.58		117 N 12,327.56 E 11,792.56	116 № 12,326.54 £ 11,752.55	115 N 12,325.52 E 11,802,54

Actual 4,284.8	90 Design 4,285.0 33 Actual 4,284.9	³ Design 4,285.00 6 Actual 4,284.8	Lesign 4,285.00 6 Actual 4,284.81	Design 4.285.00 Actual 4.284.80	Design 4,285.00 Actual 4,284.7	E 11,802.54 Design 4,285.00 B Actual 4,284.81	
310 N 12.28165 F 1150177	309 N 12.280 63	308 N 12,279.61	1009 N 12.278.59	104 N 12.277.56	105 N 12 274 54	106	

Design 4,275.00 Actual 4,274.87	Decise 4 275.00	E 11.651.74 Design 4,275.80 Actual 4,27473	£ 11.751.72	N 12,275.52 E 11,801.71 Design 4,275.80 Actual 4,274.85

1003 1003 1004 1005 1006 1007 1008 101

N 12.231.66 N 12.230.63 N 12.229.61 N 12.228.59 N 12.227.57 N 12.226.55 N 12.225.53

E 11.500.93 E 11.550.92 E 11.600.91 E 11.650.90 E 11.700.89 E 11.750.88 E 11.800.87

Design 4.265.70 Design 4.265.87 Design 4.265.85 Design 4.265.81 Design 4.265.65 Design 4.265.65 Design 4.265.65 Actual 4.265.65 Actual 4.265.42 Actual 4.265.43 Actual 4.265.45 Actual 4.265.47 Particles. 1004

ENVIROCARE

OF UTAH, INC.
THE SAFE ALTERNATIVE

Class A Top Of Waste (native soil) AWC16 &AWC18

	-	AVVC10 8	DAVIC 10			ā
Point Number	Northing	Easting	Design Elevation	Actual Elevation	Fill	
300	12670.38	12058.35	4308.60	4308.30	0.30	1
301	12669.34	12108.34	4308.60	4307.86	0.74	ĺ
302	12668.32	12158.33	4308.60	4307.88	0.72	
303	12618.33	12157.49	4306.60	4306.28	0.32	
304	12568.33	12156.65	4304.60	4304.51	0.09	À
306	12540.00	12106.17	4303.42	4303.24	0.18	
307	12569.36	12106.66	4304.60	4304.45	0.15	İ
308	12619.35	12107.50	4306,60	4306.53	0.08	
309	12820 37	12057.51	4306.60	4306.54	0.06	
310	12570.38	12056.67	4304.60	4304.51	0.09	ì
311	12540.00	12056.16	4303.38	4303.24	0.14	Ħ
89	12665.26	12308.29	4302.60	4302.40	0.20	Ĭ
100	12686.28	12258.30	4304.60	4304.50	0.10	Ħ
101	12667.30	12208.31	4306.60	4306.04	0.57	Ħ
102	12567.31	12206.64	4304.60	4304.49	0.11	Ä
103	12617.31	12207.48	4306.60	4308.12	0.48	
104	12616.29	12257.47	4304.60	4304.05	0.55	ľ
105	12566.29	12256.63	4304.60	4304.21	0.39	1
106	12565.27	12306.62	4302.60	4302.25	0.35]
107	12615.26	12307.46	4302.60	4302.14	0.46	
\$.5	12540.00	12258.19	4303.55	4303.46	0.09	as year
S.6	12540.00	12206.19	4303.45			0.44
S .7	12540.00	12156.18	4303.47	4303.25	0.22	I
S.8	12540.00	12306.20	4301.59	4301.48	0.11	1

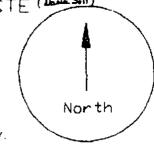
Backsight Reshoot

		GW-69	
	Northing	Easting	Elevation
Reshoot	13303.82	12701.86	4276.83
Actual	13303.81	12701.86	4276.82
Difference	0.01	0.00	0.01

Specification: At or below design grade

CLASS A TOP OF WASTE (MASSIN)
AWC16 & AWC18

KEY
Point Number
Design Elevation
Actual Elevation
Amount of Fill to Design Elev.



4,308.60 4,308.50 0.30	Pt# 38) 4,308 60 4,307 85 0.74	PtR 302 4,306.60 4,307.88 0.72	Ptm 101 4,306.60 4,306.03 0.56	Pts 100 4,304,60 4,304,50 0,10	Pt# 99 4,302.60 4,302.40 0.20
PtW 309	Pt# 308	Pt# 303	PtW 103	Pte 104	Pt# 107
4,30660	4.306.60	4,306.60	4,306.60	4,304.60	4,302.60
4,30654	4.306.52	4,306.28	4,306.12	4,304.05	4,302.14
0.06	0.07	0.32	0.48	0.55	0.46
Pte 310	Ptw 307	PtW 304	Pt# 102	Pt# 105	Pt# 106
4,304.60	4,304.60	4,304 60	4,304.60	4.304.60	4,302.60
4,304.51	4,304.45	4,304.51	4,304.49	4,304.21	4,302.25
0.09	0.15	0.09	0.1)	0.39	0.35
Pt# 311 4,303.39 4,303.24 0.14	Pt# 306 4.303.42 4.303.24 0.18	P1# \$ 7 4.303.47 4.303.25 0.22	Ptb· S.6 pfi.bc 4:50313 ***********************************	Pt0 5.5 4,303.55 4,303.46 0.09	Pt# 5.8 4,301.59 4,301.48 0.1)



Top Of Debris Survey (AWC16/AWC18)

12.670.36	N 12,669,34	N 12,668 32	N 12.467.30	N 12,646.28	N 12,665.86
E 12.050.05	E 12,100,34	E 12,759,33	E 12.206.31	E 12,258.30	E 12,308.29
B 4.300.60	B 4,300,60	B 4,309,40	D 4.306.60	D 4,364.66	D 4,308.50
A 4.300.00	A 4,300,75	A 4,307,81	A 4.306.37	A 4,364.41	A 4,308.33
F -0.20	F -015	F 0,79	F 9.23	F 0.19	F 0,27
N \$2,629 37	N 12,619 35	N 12,61833	N 12,617.3)	N 12.616 29	N 12.615.26
E 12,057 5:	E 12,107 50	E 12,15749	E 12,207.48	E 12.257 47	E 12.307.46
D 4,306,60	D 4,396,60	D 4,306,60	D 4,306.60	B 4.304 60	D 4,302.64
A 4,305,47	A 4,305,49	A 4,305,47	A 4,305.41	A 4.303.45	A 4,302.43
F 1.13	F 1,11	F 1,13	F 119	F 1.15	F 617
N 12.570.36	N 12.569.36	N 12,568 33	N 12,567.31	N 12.566.29	N 12,565.27
£ 12.056.67	E 12,106.66	C 12,156.65	E 12,206.64	E 12.236.63	E 12,306.42
B 4.304.60	D 4,304.60	D 4,304.60	D 4,304.60	D 4.304.60	D 4,302.66
A 4.303.55	A 4,303.54	A 4,303.36	A 4,303.46	A 4.303.40	A 4,302.67
£ 105	F 106	F 1,24	F 1,14	F 1.20	F -4.31
N 12.540.00	N 12,540.00	N 12.548.00	N 12 540,00	H 12,540,00	H 12,540,00
E 12.856.16	E 12,106.17	E 12.156.18	E 12,206,19 ja frak (E 12,256,19	E 12,306,26
D 4.303.38	D 4,303.42	D 4,303.47	D 44302,15 7365,57	D 4,303,55	D 4,361,59
A 4.302.31	A 4,302.10	A 4.362.37	A 4,302,06	A 4,302,46	A 4,302,05
F 1.07	F 1,32	F 1.10	F 165 (, 45	F 1.09	F -9.46

KEY

N = Northing

E = Easting

D = Design Elev.

A = Actual Elev.

F = Fill to Design Elev.

*** Tie-in PT's

1' of Debris Free aiready placed

See AWH17-H18-H20-C20 Top of Waste Survey

CRIGINAL

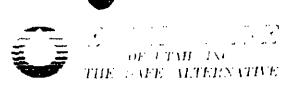
Class A Top of Waste Survey AWA18/AWB18 (Top Slope & Side Slope)

Date: 10-08-02

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115	114	113	112	111	72	71	70	69	68	67	66	65	64	63	62	61	
106	107	108	109	110	73	74	75	76	77	78	79	80	ងរ	92	83	84	
101	100	99	98	97	96	95	94	93	92	91	90	89	98	87	86	85	









Class A Top of Waste Survey

AWA18/AWB18 (Top Slope & Side Slope)

Page 2 of 4

Points List							
Pt#	Northing	Easting	Design Elevation	Actual Elevation	Fill to Design		
1	12.520.38	12,055.84	4,302.60	4,301.62	0.98		
2	12,519.36	12,105.83	4,302.60	4,302.41	0.19		
3	12,518.34	12,155.82	4,302.60	4,302.49	0.11		
4	12,517.32	12,205.81	4,302.60	4,302.39	0.21		
5	12,516.30	12,255.80	4,302.60	4,302 45	0 15		
6	12,515.28	12,305.79	4,302.60	4,302.29	0.31		
7	12,514.26	12,355.78	4,300.60	4,300.51	0.10		
8	12.513.23	12,405.77	4,298.60	4,298.44	0.16		
9	12,512.42	12,445.76	4,297.00	4,296.92	0.08		
10	12,512.21	12,455.76	4,295.00	4,294.82	0.19		
11	12,511.19	12,505.75	4,285.00	4,284.89	0.11		
12	12,510.17	12,555.74	4,275.00	4,274.92	0.08		
13	12,509.15	12,605.73	4,265.50	4,265.29	0.21		
14	12,459.16	12,604.89	4,285.61	4,265,33	0.28		
15	12,460.18	12,554.90	4,275.00	4,274.84	0.18		
16	12,461.20	12,504.91	4,285.00	4,284.91	0.09		
17	12,462.22	12,454.92	4,295.00	4,294.87	0.13		
18	12,462.42	12,444.92	4,297.00	4,296.91	0.09		
19	12,483.24	12,404.93	4,298.60	4,298.58	0.04		
20	12,464.26	12,354.94	4,300.60	4,300.45	0.15		
21	12,465.28	12,304.95	4,300.60	4,300.45	0.15		
22	12,486.31	12,254.96	4,300.60	4,300 46	0.14		
23	12,467.33	12,204.97	4,300.60	4,300.56	0.04		
24	12,468.35	12,154.98	4,300.60	4,300.51	0.09		
25	12,469.37	12,105.00	4,300.60	4,300.45	0.15		
26	12,470.39	12,055.00	4,300.60	4,300.47	0.13		
27	12,420.40	12,054.17	4,298.60	4,298.42	0.18		
28	12,419.38	12,104.16	4,298 60	4,298.48	0.12		
29	12,418.35	12,154.14	4,298 60	4,298.52	0.08		
30	12,417 33	12,204.13	4,298.60	4,298.50	0.10		
31	12,418.31	12,254.12	4,298.60	4,298.55	0.06		
32	12,415.29	12,304.11	4,298.60	4,298.47	0.14		
33	12,414.27	12,354.10	4,298.60	4,297.26	1.34		
34	12,413.25	12,404.09	4,298.60	4,298.53	0.07		
35	12,412.43	12,444.09	4,297.00	4,296.61	0.39		
36	12,412.23	12,454.08	4,295.00	4,294.93	0.07		
37	12,411.21	12,504.07	4,285.00	4,284.83	0.17		
38	12,410.18	12,554.06	4,275.00	4,274.96	0.04		
39	12,409.16	12,604.05	4,265.41	4,265.33	0.08		
40	12,359.17	12,603.22	4,255.12	4,265.41	0.71		
41	12,360.19	12,553.23	4,275.00	4,274.88	0.12		
42	12,361.21	12,503.24	4,285.00	4,284.89	0.11		
43	12,362.23	12,453.25	4,295.00	4,294.83	0.17		
44	12,363.25	12,403.26	4,295.00	4,294.82	0.18		

Burveyed By: Travis Jensen & Travis Sutherland

> Date: 10/8/2002

Specification: At or Below Design



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CRIGINAL

Pt#	Northing	Easting	Design	Actual	FIII
45	12,364.28	12,353.27	4,295.00	4,294.92	0.08
46	12,365.30	12,303.28	4,295.00	4,294.91	0.09
47	12,366.32	12,253.29	4,295.00	4,294.85	0.15
48	12,367.34	12,203.30	4,295.00	4,294 93	0.07
49	12,388.36	12,153.31	4,295.00	4,294.90	0,10
50	12,369.38	12,103.32	4,295.00	4,294 84	0.16
51	12,370.40	12,053.33	4.285.00	4,294 73	0.27
52	12,380.40	12,053.50	4,297.00	4,296.79	0.22
53	12,379.38	12,103.49	4,297.00	4,296.82	0.19
54	12,378.36	12,153.48	4,297 00	4,296.81	0.19
55	12,377.34	12,203.47	4,297.00	4,295.84	0.16
56	12,376.32	12,253.46	4,297.00	4,296.89	0.11
57	12,375.30	12,303.45	4,297.00	4,296.86	0.14
58	12,374.27	12,353.44	4,297.00	4,296.86	0.14
59	12,373.25	12,403.43	4,297.00	4,295.83	0.17
60	12,372.44	12,443.42	4,297.00	4,296.81	0.19
61	12,309.00	12,602.38	4,266.17	4,266.09	0.09
62	12,310.20	12,552.40	4,275.00	4,274.70	0.30
63	12,311.22	12,502.40	4,285.00	4,284.70	0.30
64	12,312.24	12,452.41	4.285.00	4,284.72	0.28
65	12,313.28	12,402.42	4,285.00	4,284.84	0.16
66	12,314.28	12,352.43	4,285.00	4.284.80	0.20
67	12,315.30	12,302.44	4,285.00	4,284.79	0.21
68	12,316.33	12,252.45	4,285.00	4,284,74	0.26
69	12,317.35	12,202.46	4,285.00	4,284.82	0.18
70	12,318 37	12,152.47	4,285.00	4,284.83	0.17
71	12,319.39	12,102.48	4,285.00	4,284.72	0.28
72	12,320.41	12,052.49	4,285.00	4,284.74	0.26
73	12,270.41	12,051.66	4,275.00	4,274.79	0.21
74	12,269.40	12,101.65	4,275.00	4,274.81	0.19
76	12,268.37	12,151.64	4,275.00	4,274.78	0.22
76	12,267.35	12,201.63	4,275.00	4,274.78	0.23
77	12,266.33	12,251.62	4,275 00	4,274.72	0.28
78	12,265.31	12,301.61	4,275.00	4,274.76	0.24
79	12,264.29	12,351.60	4,275.00	4,274.76	0.24
80	12,263.27	12,401.59	4,275.00	4,274.79	0.21
81	12,262.25	12,451.58	4,275.00	4,274.76	0.24
82	12,261.23	12,501.57	4,275.00	4,274.76	0.24
83	12,260.20	12,551.56	4,275.00	4,274.75	0.25
84	12,259.18	12,601.55	4,286 00	4,265.93	0.07
85	12,209.19	12,600.71	4,266.30	4,265.96	0.34
88	12,210.21	12,550.72	4,266.00	4,265 95	0.05
87	12.211.23	12,500.73	4,266.00	4,265.85	0.15
88	12,212.25	12,450.74	4,265.97	4,265.63	0.34
89	12,213.27	12,400.75	4,265.97	4,265.71	0.26
90	12,214.30	12,350.76	4,265.94	4,265.87	0.07
91	12,215.32	12,300.77	4,266.13	4,265.93	0.20
92	12,216.34	12,250.78	4,286.16	4,265.88	0.28
93	12,217.36	12,200.79	4,266.08	4,266.02	0.06
94	12.218.38	12,150.80	4,266.12	4,265.97	0.15
95	12,219.40	12,100.81	4,266.05	4,265.87	0.18
96	12,220.42	12,050.82	4.265 43	4,265.38	0.05
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Pt#	Northing	Easting	Design	Actual	Fill
97	12,221.44	12,000 83	4,265.43	4,265.36	0.07
98	12,222.47	11,950.84	4,265.29	4,265.17	0.13
99	12,223.49	11,900.85	4,265.40	4,265.19	0.21
100	12,224.51	11,850.86	4,265.48	4,265.28	0.20
101	12,225.53	11,800.87	4,265.55	4,265.44	0.11
106	12,275.52	11,801.71	4.275.00	4,274.85	0 15
107	12,274.50	11,851.70	4,275.00	4,274.87	0.13
108	12,273.48	11,901.69	4,275.00	4,274.84	0.16
109	12,272.46	11,951.68	4,275.00	4,274.97	0.03
110	12,271.44	12,001 67	4,275.00	4,274.87	0.14
111	12,321,43	12,002.50	4.285.00	4,284.77	0.23
112	12,322.45	11,952.51	4,285.00	4,284.93	0.07
113	12,323.47	11,902.52	4,285.00	4,284.78	0.22
114	12,324.49	11,852.53	4,285.00	4,284.95	0.05
115	12,325.52	11,802.54	4,285.00	4,284.81	0.19
120	12,375.51	11,803.38	4,295.00	4,293.84	1.16
121	12,374.49	11,853.37	4,295.00	4,294.85	0.15
122	12,373.47	11,903.36	4,295.00	4,294.78	0.22
123	12,372.45	11,953.34	4,295.00	4,294.81	0.19
124	12,371.42	12,003.43	4,295.00	4,294.80	0.20
125	12,381.42	12,003.51	4,297.00	4,296.82	0.18
126	12,382.44	11,953.52	4,297.00	4,296.88	0.12
127	12,383.47	11,903.53	4,297.00	4,296.90	0.10
128	12,384.49	11,853.40	4,297.00	4,296.85	0.15
129	12,385.51	11,803.55	4,297.00	4,296.61	0.39
132	12,425.50	11,804.22	4,298.60	4,298.42	0.19
133	12,424.48	11,854.21	4,298.60	4,298.36	0.24
134	12,423.46	11,904.20	4,298.60	4,298.39	0.21
135	12.422.44	11,954.20	4,298.60	4,298.29	0.31
136	12,421.42	12,004.18	4,298.60	4,298.43	0.17
137	12,540.00	12,056.16	4,303.38	4,303.27	0.11
138	12,540.00	12,106 17	4,303.42	4,303.38	0.04
139	12,540.00	12,158.18	4,303.47	4,303.28	0.19
140	12,540.00	12,206 19	4,303.51	4,303.41	0.10
141	12,540.00	12,256.19	4,303.55	4,303.37	0.18
142	12,540.00	12,306.20	4,301.59	4,301.41	0.18
143	12,525.00	12,305.95	4,302.60	4,301.72	0.88
144	12,525.00	12,355.96	4,300.60	4,300.54	0.06
145	12,525.00	12,405.97	4,298.60	4,298.32	0.28
146	12,525.00	12,445.97	4,297.00	4,296.67	0.33

CRIGINAL

* A copy of the Debris Survey is Attache	d
(Before native soli)	

| Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Company | Comp

C Officer Approval

10/9/02 Date QA Approval

Date

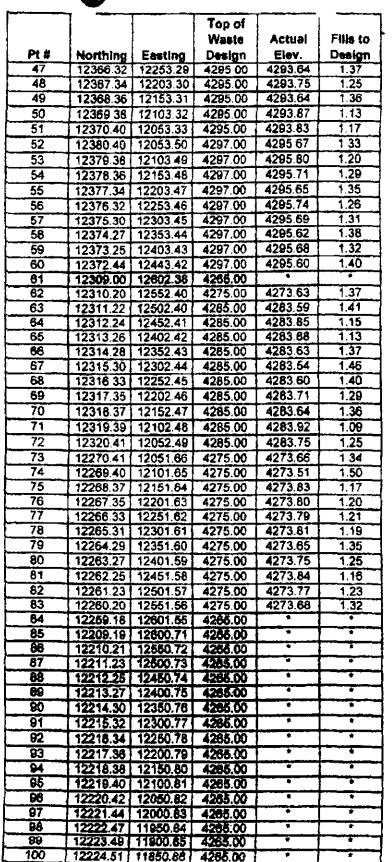
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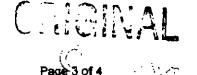


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117	116	115	114	113	112	111	72	71	70	69	68	67	66	6 5	64	63	62	61
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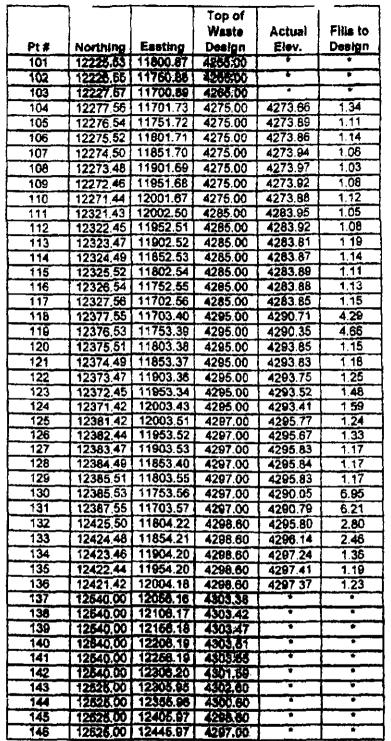


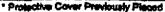
















CAIGINAL (CANAM)

Class A Top of Waste Survey

Lift Area's: AWB12/B13 12/6/02

Specification:

At or below design grade

Page 1 of **#**″i##⊾

			Design	Actual	F#I to
Pt#	Northing	Easting	Elevation	Elevation	Design
1003	12,231.66	11,500.93	4,265.70	4,265.61	0.09
1004	12,230.63	11,550.92	4.265.77	4,265.45	0.32
1005	12.229.61	11,500.91	4,265.87	4,265.42	0.45
1006	12,228.59	11,650.90	4,285.85	4,265.33	0.52
1007	12,227.57	11,700.89	4,265.81	4,265.54	0.28
1008	12,226.65	11,750.88	4,265.66	4,265.28	0.39
1009	12,278.59	11,651.74	4.275.00	4,274.73	0.27
1010	12,328.58	11.652.57	4,285.00	4,284.81	Q.1B
1011	12,378.57	11,653.41	4.295.00	4 294 74	0.28
1012	12,388.57	11,653 58	4,297.00	4.296.84	0.16
1014	12,331.64	11,502 60	4,285.00	4.284.83	0.17
1015	12,381.64	11,503.44	4,295.00	4.294.73	0.27
1016	12,391 63	11,503.61	4,297.00	4,298 80	0.20
1027	12.330.62	11,552.59	4,285.00	4,284.96	0.04
1028	12.329.60	11,602.58	4.285.00	4,284.66	0 14
1029	12,380.62	11,553.43	4,295.00	4,294 76	0.24
1030	12,379.59	11 603 42	4.295.00	4.294.89	0.11
1031	12,390.61	11,553.60	4,297.00	4.296.76	0.24
1032	12,389.59	11,603.59	4,297.00	4,297.00	0.00
1037	12,377.55	11,703.40	4,295.00	4,294.69	0.31
1038	12,387.55	11,703.57	4.297.00	4.296.89	0.11
1039	12,376.53	11,753.39	4,295.00	4.294.91	0.09
1040	12 388.53	11,753.56	4,297.00	4,295 87	0.13
1041	12,426.52	11,754 23	4,298.60	4,298.49	011
1042	12.427.54	11,704.24	4.298.60	4,298.41	0.19
1043	12,428.57	11.654.25	4,298.60	4,296.52	0.08
1044	12.429.59	11,604,26	4,298.60	4,298.54	0.07
308	12,279.61	11,601.75	4.275.00	4,274.91	0.09
309	12.280.63	11,551.76	4,275.00	4,274.93	0.07
310	12,281.65	11.501.77	4,276.00	4,274.87	0.14
101	12,225.53	11.500.87	4,265.55	4,265.44	0.11
104	12,277 56	11,701.73	4,275.00	4,274.71	0.29
105	12,276 54	11,751.72	4,275.00	4,274.81	019
105	12,275.52	11.601.71	4,275.00	4,274.85	0 15
115	12,325 52	11 802.54	4,285.00	4,284.81	0.19
116	12,326.54	11.752.55	4,285.00	4,284.78	0.22
117	12,327.56	11 702.56	4,285.00	4,284.80	0.20
120	12,375.51	11.803.38	4,295.00	4,293.84	1.16
129	12,385 51	11.803.55	4,297.00	4,296.61	0.39
132	12,425.50	11,804.22	4,298.60	4,298.42	0.18

GW-88

	Northing	Easting	Elevation			
Actual	13,697.43	12,707.84	4,276.93			
Reshoot	13,697 43	12,707,79	4,276,88			

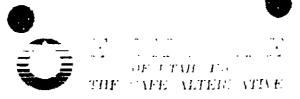
QC Pflicer Approval

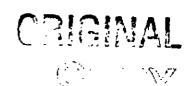
/2/9/02 Date

QA Ambrovai

12-9-02 Date

05/01/2007



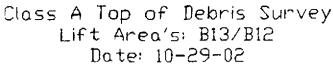


Class A Top of Debris Survey

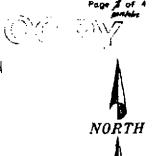
Lift Area's: B13/B12

Specification: ≥ one foot below Top of Waste Design Page of 4

PT#	Northing	Easting	Design Elevation	Actual Elevation	Fill to Design	
1003	12,231.66	11,800.93	4,265.70	4,265.70	0.00	13
1004	12,230.63	11,650.92	4,265.77	4,265.52	0.26	1
1005	12,229.61	11,800.91	4.205.87	4,265.63	0,24	1
1006	12,228.59	11,650.90	4,265.85	4,265.62	0.23	1
1007	12,227.57	11,700.89	4,265.61	4,265.63	0.18	┫.
1008	12,228.55	11,750.85	4,265.66	4,285.50	0.18	1
1009	12,278.59	11,651.74	4,275.00	4,273.90	1.10	T
1010	12,328.58	11,652.57	4,285.00	4,283.96	1.04	1
1011	12,378.57	11,653.41	4,295.00	4,293 74	1 27	1
1012	12,388.57	11,653.58	4,297.00	4,295.98	1.02	1
1014	12,331.64	11,502.60	4,285.00	4,283.61	1.39	
1015	12,381.64	11,503.44	4,295.00	4,293.66	1.34]
1016	12,391.63	11,503.61	4,297.00	4,295.97	1.03	╢
1027	12,330.62	11,552.59	4,285.00	4,283.93	1.07	7
1028	12,329.60	11,602.58	4,285.00	4,283.84	1.16	1
1029	12,380.62	11,553.43	4,285.00	4,293.83	1.17	1
1030	12,379.59	11,603.42	4,295.00	4,293.98	1.02	7
1031	12,390.61	11,553.60	4,297.00	4,295.90	1.10	1
1032	12,389.59	11,603.59	4,297.00	4,295.77	1.23	7
1037	12,377.55	11,703.40	4,295.00	4,293.70	1.30	1
1038	12,387.55	11,703.57	4,297.00	4,295.89	1.11	1
1039	12,376.53	11,753.39	4,295.00	4,293.94	1,06	1
1040	12,386.53	11,753.58	4,297.00	4,295.98	1.02	1
1041	12,426.52	11,754.23	4,298.60	4,297.24	1.37	7
1042	12,427.54	11,704.24	4,298.6C	4,297.44	1.16	1
1043	12,428.57	11,654.25	4,298.60	4,297.39	1.21]
1044	12,429.59	11,604.26	4,298.60	4,297.51	1.09]
A308	12,279.61	11,801.75	4,275.00	4,273.78	1.22]
A309	12,280.63	11,551.76	4,275.00	4,273.86	1.14	
A310	12,281.65	11,501.77	4,275.00	4,273.67	1.34	1
104	12277.56	11701.73	4275.00	4273.66	1.34]
105	12276.54	11751.72	4275.00	4273.89	1.11]
116	12326.54	11752.55	4285.00	4283.88	1 13	
117	12327.56	11702.56	4285.00	4283.85	1.15	



Surveyed By: Travis Sutherland



Page # of 4

N 12,79143 E 11,50341 TOV D 4,297.09 TOD A 4,295.97 FILL 1.03 N 12,38164 E 11,503.44 TOV D 4,295.00 TOD A 4,293.66 FILL 1.34

H 12,390.61 E 11,553460 TOV D 4,297.00 100 A 4,295.90 FILL 110 M 12.390.62 f 11.353.43 TOV D 4.295.00 TOD A 4.293.83 FILL U.7

N 12,330.62 E 11,552.59 TOW D 4,265.00 TOD A 4,263.93 FILL 1.07

N 12.429 59 E 11.60426 TOW E 4.298.60 TOW A 4.297 51 FILL 109 H 12:389:59 E 11:603:59 TOW D 4:295:77 FBL 1:23 N 12,379.59 E 11,603.42 TOW D 4,295.00 TOD A 4,293.96 Fill 1,02

N 12,428.57 E 11,654.25 TOV D 4,298.60 TOD A 4,297.39 FILL 121 N 12.388.57 E 11.651.58 TOV D 4.297.00 TOD A 4.295.98 FILL LO2

N 12,387.55 E 11,703.57 TOV D 4,297.80 TOD A 4,295.89 FRUL LIST N. 12,378 57 E 11.653 41 TOW D 4,295.00 TOD A 4,293.74 FR.L. 1,27 H 12,377.55 C 11,703.40 TOV D 4,295.00 TOB A 4,293.70 FILE 130 N 12,328.58 E 11,452.57 TOV B 4,285.00 700 A 4,283.96 FILL 184

H17 H 12:327:56 E II:702:56 TID II 4:285:00 TID A 4:283:05 FILL 1:15

N 12,427,54 E 11,704,24 TOW D 4,29860 TOD A 4,297,44 FULL 1.16

H 12,396.53 E 11,753.56 10V D 4,297.00 10D A 4,295.98 FILL LOS N 12,376,53 E 11,753,39 TOW 0 4,295,00 TOB A 4,293,94 FILL 196

N 12,426.52 E 11,754.23 TOV D 4,299.60 TOD A 4,297.24 FRLL L37

N 12.326.54 E 11.752.55 10w p 4.265.90 100 A 4.263.88 FILL 1.13

Point # N. Northing M. Morthery
E: Easting
TIV D: Top of Waste (Design)
TID A: Top of Debris (Actual)
FILL: Fill to Design

Debris Free (Native Soil)

Key

A310 N 1229145 E 1159177 TEW B 4,275,00 100 A 4,273,67 FILL 134

N 12,33164 E 11,562.60 TOW N 4,265.60 TOD A 4,283.61 FILL 1 39

"A309 N 1229063 E 11,551.76 TOV B 4.275.00 TOP A 4.273.86 FILL 114

A308 A308 N 12,279.6) E 11,601.75 TOV D 4,273.79 FILL 1.22

N 12,329.60 E 11,602.58 TOV D 4,295.90 TOD A 4,283.94 FILL 116

N 12.278.59 E 11.451.74 TOW 6 4.275.00 TOD 4 4.273.90 FILL 1.10

N 12,277.56 E 11,701.73 TOW D 4,275.00 TOD A 4,273.66 FILL 1,34

N 12,276,54 E 11,751,72 TOW 0 4,275,00 FOR A 4,273,89 FREE 1.01

H 12,23166 E 11,500,93 TOV D 4,265,79 TOD A 4,265,78 FULL 0.00

N 12,230,63 E 11,550,92 TOW D 4,265,77 TOD A 4,265,52 FILL B26

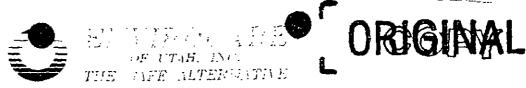
N 12,229 61 E 11,600.91 10W D 4,265.87 70D A 4,265.63 FILL 0.24

M 12.228.59 E 1).658.90 FUV 8 4.265.85 FUD A 4.265.62 FILL 0.23 100? N 12,227.57 E 11,700.09 TOW D 4,265.81 TOB A 4,265.63 FILL 0.18

H 12,226.55 E 11,750.89 TOW D 4,265.66 TOE A 4,265.50 FILL 016

ENVIROCARE OF UTAH. INC. THE SAFE ALTERNATIVE

previously placed (foe of Vaste)



Class A Top of Waste Survey

Lift Area's: E6, F9, B6 & C10

Specification:

At or Below Top of Waste Design

Date: 3/25/03

Page 1 of 3

			Top of Waste	Top of Waste	6
	1	{	Design	Actual	Fill to
Pt#	Northing	Easting	Elevation	Elevation	Design
1001	12,541.01	11,045.95	4,302 60	4,302.42	0.18
1002	12,491 02	11,045.11	4,300.60	4,300.47	0.13
1003	12,441.03	11,044.27	4,298.60	4,298.39	0.21
1004	12,401 03	11,043.60	4,297.00	4,296.81	0.19
1005	12,391.03	11,043.43	4,295.00	4,294.87	0.13
1006	12,341.04	11,042.59	4,265.00	4,284.93	0.07
1007	12,291.05	11,041.75	4,275.00	4,274.83	0.17
1008	12,241.05	11,040.91	4,266.12	4,265.82	0.30
1009	12,492.04	10,995.12	4,300.60	4,300.48	0.13
1010	12,493.06	10,945.13	4,300.60	4,300.44	0.16
1011	12,242.07	10,990.92	4,266.13	4,265.89	0.24
1012	12,243.10	10,940.93	4,265.95	4,265.72	0.23
1013	12,442.05	10,994.28	4,298.60	4,298.40	0.20
1014	12,443.07	10,944.29	4,298.60	4,298.40	0.20
1015	12,402.05	10,993.61	4,297.00	4,296.89	0.11
1016	12,403.07	10,943.62	4,297.00	4,296.77	0.23
1017	12,392.05	10,993.44	4,295.00	4,294.91	0.09
1018	12.393.08	10,943.45	4,295.00	4,294.91	0.09
1019	12,342.06	10,992.60	4,285.00	4,284.86	0.14
1020	12,343.08	10,942.61	4,285.00	4,284.94	0.06
1021	12,292.07	10,991.76	4.275.00	4,274.80	0.20
1022	12,293.09	10,941.77	4,275.00	4,274.91	0.09
1023	12,542.03	10,995.96	4,302.60	4,302.49	0 11
1024	12,543.06	10,945.97	4,302.60	4,302.53	0.07
1025	12,487.96	11,195.08	4,300.60	4,300.41	0.19
1026	12,488.98	11,145.09	4,300.60	4,300.38	0.22
1027	12,490.00	11,095.10	4,300.60	4,300.47	0.13
1026	12,237.99	11,190.88	4,265.78	4,265.72	0.06
1029	12,239.01	11,140.89	4,266.05	4,265.77	0.28
1030	12,240.03	11,090,90	4,266.05	4,265.82	0.24
1031	12,437.96	11,194.24	4,298.60	4,298.46	0.14
1032	12,397.97	11,193.57	4.297.00	4,296.78	0.22
1033	12,387.97	11,193.40	4,295.00	4,294.90	0.10
1034	12,337.98	11,192.56	4,285.00	4,284.91	0.09
1035	12,287.98	11,191.72	4,275.00	4,274.86	0.15
1036	12,438.98	11,144.25	4,298.60	4,298.53	0.07
1037	12,440.01	11,094.26	4,298.60	4,298.42	0.18
1038	12,398.99	11,143.58	4,297.00	4296.78	0.22
1039	12,400.01	11,093.59	4,297.00	4,296.85	
1040					0.15
	12,388.99	11,143.41	4,295.00	4,294.94	0.06

Top or waste Fill to

Design

0.13

0.10

0.08 0.11

0.08

0.14

0.14

0.18

0.14

0.13

0.11

0.22

0.18

0.23

0.13

0.14

0.15

0.09

0.20

0.03

	2	_5	3	
Page	4	ΟI	J	

GW-89

Top of Waste Design

Elevation

4,295.00

4,285.00

4,285.00

4,275.00

4,275.00

4,302.60

4,302.60

4,302,60

4,304.60

4,304,60

4,304.60

4,304.60

4,302.60 4,300.60

4,298.60

4,297.00

4,295.00

4,285.00

4,275.00

4,265.90

Actual

Elevation

4,294.87

4.284.90

4,284.92

4,274.89

4,274.92

4,302,46

4,302.46

4,302.42

4,304,46

4.304.47

4,304.49 4,304.38

4,302.42

4.300.37

4,298.47

4.295.87

4,294.85

4,284,91

4,274.80

4,265.87

	Northing	Easting	Elevation
Actual	13,303.82	12,701.86	4,276.83
Reshoot	13,303.77	12,701.84	4,276.80

Officer Approval

Pt#

1041

1042

1043

1044

1045

1046

1047

1048

1049

1050

1051

1052

1053

1054

1055

1056

1057

1058

1059

1060

Northing

12,390.01

12.339.00

12,340.02

12,289.00

12,290.03

12,537.95

12,538.97

12,539.99

12,586.92

12,587.94

12,588.96

12,589,99

12,536.93

12,486.94

12,436.94

12,396.95

12,386.95

12,336.96

12,286.96

12,236.97

Easting

11,093.42

11,142,57

11,092.58

11,141.73

11,091.74

11,195.92

11,145.93

11,095.94

11,246.75

11,196.76

11,146.77

11,096.78

11,245.91

11,245.07

11,244.23

11,243.56

11,243.39

11,242,55

11,241.71

11,240.87

QA Approval

Class A Top of Waste AWH20/AWC20 Slopes

Surveyed By Reed Bayester

Date. 1/2/01

PT.#	Northing	Easting	Target	Actual	Fill		
1	12762.39	12449.94	4297.00	4298.48	0.5		
2	12712.39	12449.10	4297.00	4296.40	0.6		
3	12662,40	12448.27	4297.00	4296,49	0.5		
4	12612.41	12447.43	4297.00	4296.45	0.5		
5	12562.41	12446.60	4297.00	4296.36	0.6		
6	12512.42	12445.76	4297.00	4298.16	0.8		
7.	12512.21	12455.76	4295.00	4294.48	0.5		
8	12562.21	12456.59	4295.00	4294.23	0.8		
9	12612.20	12457.43	4295.00	4294.12	0.9		
10	12882.19	12458.27	4295.00	4294.56	0.4		
11	12712.19	12459.10	4295.00	4294.83	0.2		
12	12762.18	12459.94	4295.00	4294.64	0.4		
13	12761.16	12509.93	4285.00	4284.97	0.0		
14	12711.17	12509.09	4285.00	4284.73	0.3		
15	12661.17	12508.25	4285.00	4284.88	0.1		
16	12611.18	12507.42	4285.00	4284.91	0.1		
17	12561.19	12506.58	4265.00	4284.79	0.2		
18	12511.19	12505.75	4285,00	4284.64	0.4		
19	12510.17	12555.74	4275.00	4274.66	0.3		
20	12580.17	12556.57	4275.00	4274.71	0.3		
21	12610.16	12557.41	4275.00	4274.59	0.4		
22	12660.15	12558.24	4275.00	4274.70	0.3		
23	12710.15	12559.08	4275.00	4274.49	0.5		
24	12760.14	12559.92	4275.00	4273.58	1,4		
25	12759.12	12609,91	4265.82	4265.81	0.0		
26	12709.12	12609.07	4286.37	4265.48	0.9		
27	12659.13	12608.23	4265.60	4265.37	0.2		
28	12609.14	12607.40	4265.44	4265.14	0.3		
29	12559.14	12606.56	4265.38	4265.16	0.2		
30	12509.15	12605.73	4285.57	4285.20	0.4		

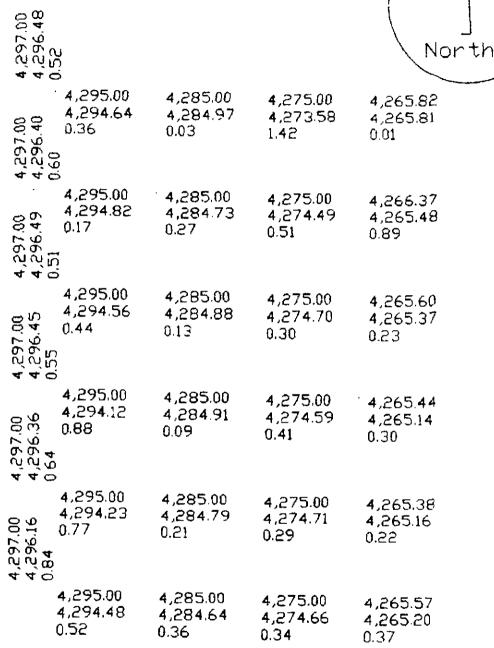
Backsight chack GW-89										
	Northing	Easting	Elevation							
reshoot	13303.63	12701.86	4276.82							
actual	13303.82	12701.86	4276.83							
diff.	-0.02	0.00	0.01							

QC Officer Approved Date

QA Engineer Approval

Saté





Key
Target = top number
Actual = middle number
Fill = bottom number

1



CLASS A (Top of Waste)

PT.			Design	Actual	
#	Northing	Easting	Elevation	Elevation	Fill
1	12762.39	12449 94	4297.00	4298 58	0.42
2	12712.39	12449.10	4297.00	4296 76	0 24
3	12682 40	12448.27	4297 00	4296.92	0.08
4	12612 41	12447,43	4297.00	4298 71	0.29
5	12562 41	12446.60	4297.00	4296.92	0.06
6	12563 23	12406 60	4298 60	4298.47	0.13
7	12613.22	12407.44	4298.60	4298 46	0.14
8	12663 22	12408.26	4298.60	4298 47	0.13
9	12712.21	12409.11	4298 60	4298.46	014
10	12763.20	12409.95	4298.60	4298 40	0.20
11	12764.22	12359.96	4300.60	4300 53	0 07
12	12714.23	12359.12	4300.60	4300.55	0.05
13	12664.24	12358.29	4300.60	4300.53	0.08
14	12614.24	12357.45	4300.80	4300 52	0.06
15	12564.25	12356 61	4300.60	4300.49	0.11
18	12565.27	12306.62	4302.60	4302.38	0 22
17	12615.26	12307.46	4302.50	4302 40	0.20
18	12665.26	12308 30	4302.60	4302.39	0.22
19	12715.25	12309.13	4302.60	4302.47	0.13
20	12765.24	12309.97	4302 60	4302.33	0.27
21	12525 00	12445.97	4297.00	4296 80	0.20
22	12525.00	12405.97	4298.60	4298 42	0.18
23	12525.00	12355.96	4300,60	4300.50	0.10
24	12525 00	12305.95	4302.60	4302.23	0.37
25	12720.36	12059.18	4310 60	4310 41	0.19
26	12670.36	12058.35	4308.60	4308.45	0.16
27	12669.34	12108.34	4308.60	4308.36	0 24
28	12719.34	12109.17	4310.60	4310,33	0.27
29	12759.33	12110.01	4310.60	4310.26	0.32
30	12768.31	12160.00	4306.60	4308.25	0.36
31	12718.31	12159 16	4308.60	4308.26	0.34
32	12868.32	12156 33	4300.60	4308.14	0.46
33	12667.30	12206.32	4306.60	4308 37	0 23
34	12717.29	12209 15	4308.60	4306 44	0 16
35	12767 29	12209 99	4306.60	4306.28	0.32
36	12786.27	12259.98	4304.60	4304.31	0.29
37	12716.27	12259.14	4304.60	4304.53	0.07
38	12666.28	*12258.31	4304.60	4304 41	0.19

Page 1 of 2

<u>Lift Area's</u> AWH17, AWH18, AWH20 & AWC20

Surveyed By: Brennen Dick

Date: 12/10/01

Backsight Reshoot GW-89

	Northing	Easting	Elevation
Reshoot	13303.82	12701.58	4276.78
Actual	13303.82	12701.86	4276.83
Difference	0.00	0.02	-0.05

Specification: At or below design grade elevation

Q.C. Officer Approval

12/11/01 Date A Approval

/2-/2-0/ Date



CLASS A TOP OF WASTE AWH17, AWH18, AWH20 & AWC20 page 2 of 2

Point Number Design Elevation Actual Elevation Anount of Fillto Design

> Pt# 30 4,308.60 4,308.24 0.36

Pt# 29 4,310.60 4,310.28 0.32 Pt# 31 4,308.60 4,308.26 0.34

Pt# 28 4,310.60 4,310.33 0.27

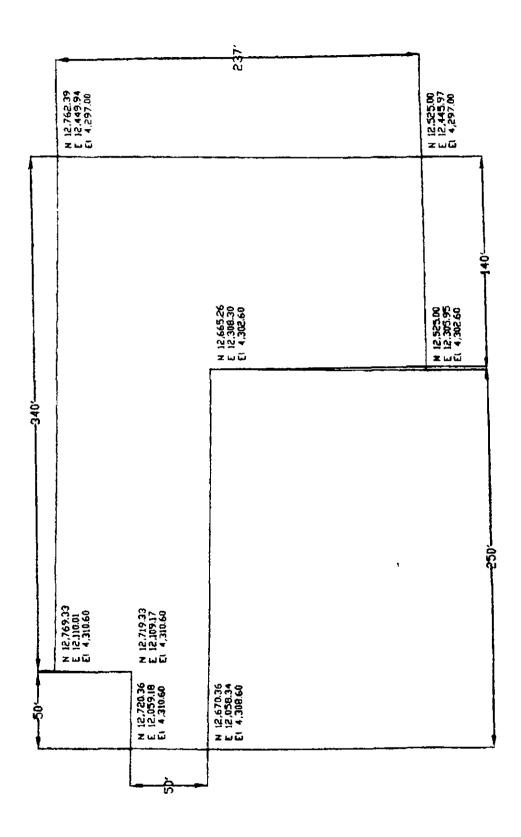
Pt# 25 4,310.60 4,310.41 0.19 Pt# 32 4,308.60 4,308.14 0.46

Pt# 27 4,308.60 4,308.36 0.24

Pt# 26 4,308.60 4,308.44 0.16

ᅜ

Pt# 1	Pt# 2	Pt# 3	Pt# 4	Pt# 5	Pt# 21
4,297.00	4,297.80	4,297,00	4,297 00	4.297.00	4,297.00
4,296.58	4,296.76	4,296.92	4,295.71	4.296.92	4,296.80
042	0.24	0.08	0.29	0.08	0.20
Pt# 10	Pt# 9	Pt# 8	Pt# 7	Pt# 6	Pt# 22
4,298.60	4,298.60	4,298.60	4,298.60	4,298.60	4,298.60
4,298.40	4,298.46	4,298.47	4,298,46	4,298.47	4,298.42
0.20	0.14	0.13	0.14	0.13	0.18
Pt# 11	Pt# 12	P+# 13	Pt# 14	Pt# 15	Pt# 23
4,300.60	4,300.60	4,300.60	4,300.60	4,300.60	4,300.60
4,300.53	4,300.55	4,300.52	4,300.52	4,300.49	4,300.50
0.07	0.05	0.08	0.08	011	0.10
Pt# 20	Pt# 19	P+# 18	Pt# 17	Pt# 16	Pt# 24
4,302,60	4,302.60	4,302.60	4,302.60	4,302.60	4,302.60
4,302,33	4,302.47	4,302.39	4,302.40	4,302.38	4,302.23
0.27	0.13	0.22	0.20	0.22	0.37
Pt# 36 4,304.60 4,304.31 0.29	Pt# 37 4,304.60 4,304.53 0.07	Pt# 38 4,304.60 4,304.41 0.19		·	
Pt# 35 4,306.60 4,306.28 0.32	Pt# 34 4,306.60 4,306.44 0.16	Pt# 33 4,306.60 4,306.37 n23			



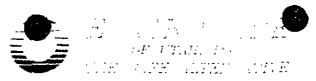




E6-B6-F9 & C10 3-25-03 (page 3 of 3)

		· 1 · · · ·	,			
			1852 8 12,389.99 E 11,096.78 Besign 4,304.60 Actual 4,384.38	1051 N 12,588.96 E 11,146.77 Design 4,304.60 Actudi 4,304.49	1850 N 12:587.94 E 11:196.76 Design 4,304.60 Actual 4,304.47	1045 N 12,596-92 E 11,246-75 Qesign 4,304.60 Actual 4,304.46
1024	1023	1001	1048	1047	1046	1053
N 12.543.06	N 12.542.03	M 12,54141	N 12,539.99	N 12.538.97	M 12,537.95	N 12,536,93
E 10.945.97	E 10.995.96	C 11,045.95	E 11,095.94	E 11,45.93	E 11,195.92	C 11,245,91
Design 4.302.60	Besgn 4.302.60	Design 4,302.68	Besign 4,302.60	Design 4,302.60	Design 4,302.46	Design 4,302.40
Actual 4,302.53	Actual 4.302.49	Actual 4,302.42	Actual 4,302.42	Actual 4,302.46	Actual 4,302.46	Actual 4,302.42
1010	1007	1002	1927	1026	1025	1054
N 12,493,96	N 12.49254	W 12,494.02	N 12,490.00	N 12,480.98	N 12,487.76	N. 12,486,54
C 10,943,13	C 10.79512	C 11,045.11	E 11,095.10	E 11,145.05	F 11,195.89	E. 11,245,07
Besign 4,300,68	Desgn 4.30040	Design 4,300.60	Design 4,380.60	Design 4,300.60	Design 4,300.40	Design 4,300,60
Actual 4,300,44	Actual 4,30048	Actual 4,300.47	Actual 4,300.47	Actumi 4,300.38	Actual 4,300.41	Actual 4,300,37
1014	1013	1083	1037	1036	1031	1035
N 12.443.07	N 12,44205	N 12,441.63	A 12,440.01	M 12,438.98	N 12,437.96	et 12,436,94
E 10.4429	E 10.59428	E 11,044.27	E 11,094.26	E 17,144.25	C 11,194.24	E 13,244,23
Design 4.298.60	Design 4.29860	Demon 4,298.60	Design 4,298.60	Besign 4,298.50	Design 4,298.60	Design 4,298,60
Actual 4.298.49	Actumi 4.29840	Actual 4,298.39	Actual 4,298.42	Actual 4,298.52	Actual 4,298.46	Actual 4,298,47
10)6	1015	(004	1839	1038	1032	1056
H 12,403.07	N 12,402,85	et 52,401.03	N. 12,400.01	M 12,348.99	N 12,397,97	H 12,396,95
E 10,942,62	E 10,993,61	E 11,043,68	E. 11,093.54	E 11.143.58	E 11,193,57	E 11,243,56
Design 4,297.00	Design 4,296,89	Design 4,297.00	Design 4,297.00	Design 4,297.00	Design 4,297,00	Design 4,297,00
Actual 4,296.77	Actual 4,296,89	Actual 4,296.81	Actual 4,296.85	Actual 4,296.78	Actual 4,296,78	Actual 4,296,87
1916	1017	1005	104	1040	1033	1957
N 12,393.68	N 12,392.05	N 12,391,83	N [2,3900]	N. 12,388.99	N 12,387.57	M 12,386.95
£ 10,943.45	E 10,993.44	E 11,043,43	E [1,093.42	E. 11,43.41	E 11,193.40	E 11,243.39
Design 4,295.60	Design 4,295.00	Design 4,295,00	Breign 4,295.00	Design. 4,295.00	Design 4,295.00	Design 4,295.00
AC1461 4,294.91	Actual 4,294.91	Actual 4,294,87	Actual 4,294.87	Actuat. 4,294.94	Actual 4,294.90	Actual 4,294.85
1020	1019	1006	1942	1042	1034	1658
H 12,243.00	N 12,34206	N 12,341.04	In 12,340.02	N 12,339,00	N 12,327,98	N 12,336-96
E 10,942.61	E 10,99260	E 11,042.59	If 11,912.58	E 11,142,57	E 11,198,56	E 11,242:55
Design 4,203.90	Design 4,28580	Draign 4,285.00	Design 4,265.00	Besign 4,265,00	Design 4,265,66	Design 4,265.00
Actual 4,284.94	Actual 4,284.86	Actual 4,284.93	Actual 4,284,92	Actual 4,284,90	Actual 4,294,91	Actual 4,284-91
1622	1921	1807	1045	1044	1035	1059
N 12293.09	M 12,292.07	N 12,291,83	M (2,290.03	N 18,289.06	N 12,287.98	N 1228636
E 10,941.77	E 18,991.76	C 11,041,75	E (1.091.74	E 11,141.73	E 11,191.72	E 1124171
Design 4,275.00	Besign 4,275.00	Design 4,275,00	Design 4,275.00	Design 4,275.00	Design 4,275.00	Design 4273.00
Actual 4,274.91	Actual 4,274.80	Actual 4,274,83	Actual 4,274.92	Actual 4,274.89	Actual 4,274.86	Actual 4274.00
1012	3011	1809	1036	1029	028	068
N 12,24310	N 12,242,07	N 12,241,05	N 12.240.03	H 12,239.01	12,237.99	N 12,236.97
E 10,94693	E 10,990.92	E (1,040,9)	C 11.090.90	E 11,148.89	E 11,190.98	E 11,240.87
Design 4,265,95	Design 4,266.13	Draign 4,266,12	Design 4,266.05	Design 4,266.03	Design 4,265.78	Design 4,265.90
Actual 4,265,72	Actual 4,265.89	Actual 4,265,92	Actual 4,265.82	Actual 4,263.77	Actual 4,265.72	Actual 4,263.87







Class A Top of Debris Survey

Lift Area's: E6, F9, B6 & C10

Specification:

≥ 1 foot below Top of Waste Design

Date: 3/04/03

Page 1 of 3

		reoign	lop of Waste	Top of Debris	Fill to
<u> </u>	1	ļ	Design	Actual	Top of
Pt#	Northing	Easting	Elevation	Elevation	Waste
1001	12,541.01	11,045.95	4.302.60	4,301.55	1.05
1002	12,491.02	11,045.11	4,300.60	4,299.38	1.22
1003	12,441.03	11,044.27	4,298.60	4,297.34	1.26
1004	12,401.03	11,043.60	4,297.00	4,295.78	1.22
1005	12,391.03	11,043.43	4,295.00	4,293.84	1.16
1006	12,341.04	11,042.59	4,285.00	4,283.81	1.19
1007	12,291.05	11,041.75	4,275 00	4,273.80	1.20
* 1008	12,241.05	11,040.91	4,266.12	4,265.68	0.44
1009	12,492.04	10,995.12	4,300.60	4,299.26	1.34
1010	12,493.06	10,945.13	4,300.60	4,299,41	1.19
. * 1011	12,242.07	10,990.92	4,266.13	4,265.81	0.32
* 1012	12.243 10	10,940.93	4,265.95	4,265,86	0.09
1013	12,442.05	10,994.28	4,298.60	4,297.27	1.33
1014	12,443.07	10,944.29	4,298.60	4,297,47	1.13
1015	12,402.05	10,993.61	4,297.00	4.295.64	1.36
1016	12,403.07	10,943.62	4,297.00	4,295.71	1.29
1017	12,392.05	10,993.44	4,295.00	4,293.84	1.16
1018	12,393.08	10,943.45	4,295.00	4,293.85	1.15
1019	12,342.06	10,992.60	4,285.00	4,283.82	1.18
1020	12,343.08	10,942.61	4,285.00	4,283.86	1.15
1021	12,292.07	10,991.76	4,275.00	4,273.91	1.09
1022	12,293.09	10,941.77	4,275.00	4,273.86	1.14
1023	12,542.03	10,995.96	4,302.60	4,301.36	1.24
1024	12,543.06	10,945.97	4,302.60	4,301.48	1.12
1025	12,487.96	11,195.08	4,300.60	4,299,51	1.09
1026	12,488.98	11,145.09	4,300.60	4,299.37	1.23
1027	12,490.00	11,095.10	4,300.60	4,299.32	1.28
1028	12,237.99	11,190.88	4,265.41	4,265.39	0.02
1029	12,239.01	11,140.89	4,265.70	4,265.33	0.37
* 1030	12,240.03	11,090.90	4,266.05	4,265.98	0.07
1031	12,437.96	11,194.24	4,298.60	4,297.39	1.21
1032	12,397.97	11,193.57	4,297.00	4,295.89	1.11
1033	12,387.97	11,193.40	4,295.00	4,293.80	1.20
1034	12,337.98	11,192.56	4,285.00	4,283.94	1.06
1035	12,287.98	11,191.72	4,275.00	4,273.98	1.02
1036	12,438.98	11,144.25	4,298.60	4,297.44	1.16
1037	12,440.01	11,094.26	4,298.60	4,297.52	1.08
1038	12,398.99	11,143,58	4,297.00	4,295.87	1.13
1039	12,400.01	11,093.59	4,297.00	4,295.76	1.24
1040	12,388.99	11,143.41	4,295.00	4,293.81	1.19



E6-B6-F9 & C10 3-04-03 (page 3 of

| 1052 | 1051 | 1050 | 1049 | 1049 | 1050 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 | 1049 |

1024 | 1023 | 1001 | 1048 | 1047 | 1046 | 1053 | 1015 | 12.543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10.1543.01 | 10

| 1010 | 1029 | N 12.492.04 | E 10.94513 | E 10.99512 | TOV Et 4.300.60 | Actual Et 4.29941 | Actual Et 4.299.26 | FRI 1.34

1014 1013 N 12,442.05 E 10,944.29 E 10,944.29 E 10,944.29 TOV E1 4,298.60 Actual E1 4,297.47 Fill 1.13 Fill 1.33 15)4

1016 1015 1004 1039 1038 1032 1056 N 12,402.05 N 12,401.03 N 12,402.01 N 12,398.99 1038 1032 1056 N 12,403.07 N 12,402.05 N 12,401.03 N 12,402.01 N 12,398.99 N 12,397.97 N 12,396.95 FIVE 14,297.00 TOV E1 4,297.00 TOV E1 4,

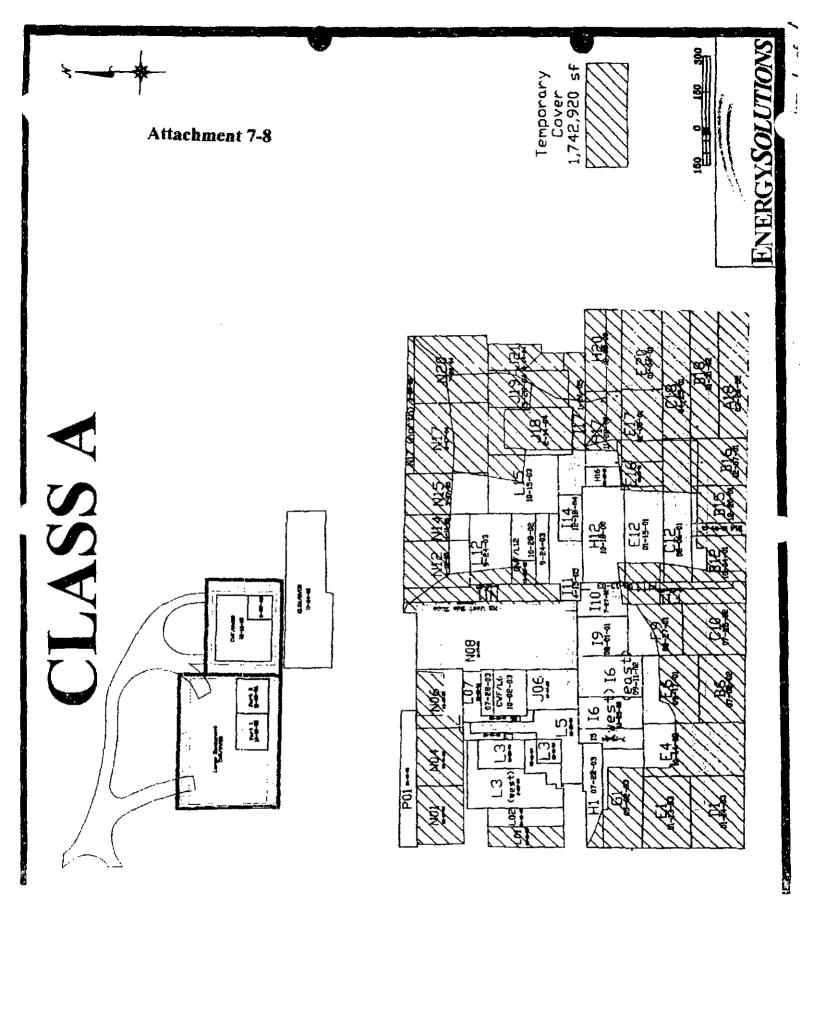
1003 1037 1036 1031 1055 1055 N 12,4403 N 12,4403 N 12,430,98 N 12,437.96 N 12,436,94 E 11,044,27 TOV C1 4,298,60 TOV C1 4,298,60 Actual El 4,297,32 Actual El 4,297,42 Fit 1,28 Fit 1,08 Fit 1,16 Fit 1,16 Fit 1,16 Fit 1,16 Fit 1,16 Fit 1,18

| 1912 | 1911 | 1908 | 1930 | 1929 | 1928 | 1930 | 1929 | 1928 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 | 1930 |

Toe of Waste (protective cover previously placed)



ATTACHMENT 4



3 2.71 2.03 0.60 0.24 -0.20) 564 5.38 5.22 "-083"-0.56) \$18 5.96 \$20 -0.49 \$73 ~0.11 b.89 1.23 /186 b.97 : 1.23 1.68 /1.70 11.32 1.18 : 1.95 2.78 1.97 -0.16 1.00 7.84 310 1.45 -ale 1.63 7.15 3.19 1.84 -0.10 1.55 227 1.53 5.30 5.41 -0.03 0.16 1.32 -0.50 0.39 1.62 -0.51 1.23 1.44 -0.48 1.47 \$39 -0.93 1.68 1.77 4.18 0.31 -0.96 -0.84 -0.10 -0.50-0.21 22 b.43 b.74 b.90 /H**1874**20/C**Z**0H20 282 224 PRI PRI 284 892 8.28 0.68 1-0.67 *0.10 azs£ 20 වියද විය විය වියද 3000 000 1000 0.34 -0.19+0.30[20 0.47 0.13 -0.03 b.12 " AEI B.18 NO DIS -03 to3(SS) 1.0- 6.43 0.00 E 5.28 6.79 6.65 has 5.91 0.05 0.46 0.26 0.44 bis 0.95 0.85 0.74 hos 0.25 जा क्रिका खें हैं। TS)

MAS'S PLACEMENINION SURVAYSTATORE A TOM 4-13-07 TOTA DWG. S/'/2007 9:54.07 AM. Ibungalle

Attachment C - Buried stream channel"

EnergySolutions wrote a letter to the State of Utah on July 24, 2004 that stated "Recent experience in the eastern portion of Section 29 indicates that there is a buried stream channel that may run through CME's proposed site." (Section 29)

Rather than conduct any studies about this identified "buried stream channel" the State chose to ignore this potential threat to the site. Did anyone verify that there truly was a buried stream in Section 29? Did any one find the ends of the buried stream? Did anyone determine if this was the only stream in the area? How did someone conclude that there was no buried stream under Section 32 since there have not been excavations that deep in Section 32 as the ones that identified the buried stream in Section 29? There are many questions that need to be asked and answered before the State determines that this issue is not worth investigating further.

Attachment D - Limit Frost Penetration

Item 1 – Energy Solutions has performed many surveys on the already constructed cover system and has reported that they anticipate that in 2004 the embankment did not settle but actually rose as much as 6". See Attachment 2 which is a summary of the LARW Annual Settlement Data. EnergySolutions explains this unusually result was due to frost heave. (Report on the combined embankment study performed by AMEC earth and Environment on December 13, 2005). That report states that "The year 2004 measurements were conducted during the middle of the winter and "heave" is evident in the data. Frost heave is caused when water particles in the material freeze and expand, causing the surface of the ground to raise. This report from EnergySolutions brings up a major concern about the depth of frost penetration into the radon barrier. The question is how deep the frost would have to penetrate to get the surface of the soil to raise 6". Be aware that the top 18" of the rock cover would not create any raise at all because there would be no moisture in this zone to freeze. Below that is the filter zones, sacrificial soil and radon barrier. If all of these layers were to create 6" of heave then the depth of the frost must have been quite deep. It is very likely that if the surface rose 6" that the frost would have had to penetrate down into the radon barrier. This concern should be addressed and studied to determine how deep the frost penetrated to produce 6" of frost heave. There are several reasons that there may more frost penetration than has been suggested. These ideas are found in Items 2 and 3.

Item 2: Energy Solutions has performed a technical review that would suggest that the maximum depth of the frost penetration would be 3.4 feet. This is extremely close to the maximum limit. Based on their analysis the frost will penetrate within 1.1 inches of the radon barrier. A major problem in the analysis is that "Both analyses incorporated a temperature data set based on the lowest recorded high and low temperature on each day through the freezing season (October through April) over the 47 years of data available from Dugway, Utah." Dugway is about 50 miles from the Clive site. There is similar data from a station located at Knolls, Utah which is less than 10 miles from the site. Why would anyone choose to use data 50 miles away when data from a much closer site is available and more representative of the site. A look at the Average Minimum (the input data for the frost penetration analysis) temperatures from the two locations show that the differences could create a problem. Attachment 1 shows the actual data from the two locations.

AVERAGE MINIMUM TEMPERATURES (F)

	DUGWAY	KNOLLS	Difference
October	35.4	34.8	-0.6
November	25.7	24.0	-1.7
December	17.7	12.1	-5.6
January	16.0	10.1	-5.9
February	22.5	18.0	-4.5
March	28.5	29.0	+0.5
April	35.5	37.6	+2.1

It is easy to see that during the coldest three months the average minimum temperature is 5 degrees less at Knolls than it is at Dugway. It is almost a given that this improved data would create a deeper frost penetration depth than is currently expected.

Item 3 – The frost penetration analysis is almost 10 years old and has not been updated with the new cover design. Some may say that this is not critical, however one of the main factors in frost penetration and frost heave is the amount of moisture in the soil material. A major concern is that there is no accurate data on how much moisture is being retained in the cover material. Energy Solutions has been asked to provide data from the cover test pad for over six years. To date they have yet to provide this important data that would help to determine the effects of frost heave and frost penetration. Until this data is available it is impossible to properly know the effects of frost penetration. The data should be gathered and the results should be used to better design the cover of the cells.

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Note: In all cases, negative numbers indicate settlement, and positive num

KNOLLS 10 NE, UTAH (424748)

1961-1990 Monthly Climate Summary

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual
Average Max. Temperature (F)	33.1	42.2	55.3	67.8	73.1	86.9	94.3	91.4	81.6	67.2	49.8	36.0	65.1
Average Min. Temperature (F)	10.1	18.0	29.0	37.6	43.9	54.8	61.2	57.9	47.1	34.8	24.0	12.1	36.0
Average Total Precipitation (in.)	0.41	0.27	0.54	0.86	1.06	0.31	0.18	0.33	0.53	0.70	0.42	0.54	6.14

Unofficial values based on averages/sums of smoothed daily data. Information is computed from available daily data during the 1961-1990 period. Smoothing, missing data and observation-time changes may cause these 1961-1990 values to differ from official NCDC values. This table is presented for use at locations that don't have official NCDC data. No adjustments are made for missing data or time of observation. Check in the location table for official data.

Western Regional Climate Center,